

# **Shropshire Local Plan Review**

## **Summary of Representations on the Regulation 19: Pre- Submission Draft of the Shropshire Local Plan**

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# Shropshire Local Plan Review

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

### Introduction

Following approval by Shropshire Council's Cabinet, the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan and its supporting documents were published on the 18th December 2020, in order to invite representations from all parties on its soundness, legal compliance and compliance with the duty-to-cooperate. Representations were invited by 5pm on Friday 26th February 2021 (the representation period was extended in response to lockdown restrictions).

The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan represents an advanced and fully formed version of the Local Plan. It identifies a vision and framework for the future development of Shropshire to 2038; addresses needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seeks to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design. It contains:

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

To assist in making representations a two-part Representation Form (adapted from the Planning Inspectorate's model form), was made available for all interested parties to complete and submit. Part A: Representation Form was for personal details and needed to only be completed once. Part B: Representation Form was for interested parties to provide their representation(s). A separate Part B: Representation Form was requested for each representation about a relevant paragraph, policy (including its explanation) or site an interested party wished to make.

Representations could address any of the Supporting Documents and/or Evidence prepared to support the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, by relating them to the resulting paragraph, policy (including its explanation) or site in the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan.

Representations were also invited on the Sustainability Appraisal and Habitats Regulations Assessments undertaken to inform the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.

A Guidance Note which sought to assist all parties who wished to submit representations, including on how best to complete the two-part Representation Form (again adapted from the Planning Inspectorate's model guidance note) was also provided.

During this consultation, around 680 unique respondents submitted around 2,400 duly-made representations. Respondents included local residents, businesses, town and parish councils, neighbouring local authorities, statutory consultees and a range of other organisations.

Appropriately redacted versions of these representations are provided on the Shropshire Council website.

Two non-duly made representations were also received. Whilst these non-duly made representations have not been considered, appropriately redacted versions are provided on the Shropshire Council website.

This document contains three schedules, these are:

**Schedule 1:** A high-level summary of the key issues raised, within duly-made representations received, including those of soundness, legal compliance and compliance with the duty to cooperate for:

- a. The overall draft document/consultation, where these are not considered under a relevant draft Policy;
- b. The draft Spatial Vision and draft Objectives, where these are not considered under a relevant draft Policy;
- c. Each draft Policy (for settlement policies this includes relevant schedules of proposed allocations);
- d. The Appendices of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, where these are not considered under a relevant draft Policy;
- e. The Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, where these are not considered under a relevant draft Policy; and
- f. The Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, where these are not considered under a relevant draft Policy.

The summary is arranged to reflect the order of the draft Policies within the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.

A high-level response to the key issues raised, including those of soundness, legal compliance and compliance with the duty to cooperate for each of the above is also provided by Shropshire Council.

**Schedule 2:** A high-level summary, of the duly-made representations received. This summary is presented in five columns, these are:

**Columns 1 and 2:** The unique reference for the respondent (A reference) and their representation(s) (B reference). Please note each individual respondent is registered once (A Reference). However, each respondent may have multiple representations (B references), which are numbered B001, B002, B003 etc.

**Column 3:** Summarises the response to **Question 1: To which document does this representation relate?** of the Part B Representation Form. The summary indicates a document to which the representation relates. It is acknowledged that many representations relate to a number of documents.

**Column 4:** Summarises the response to **Question 2: To which part of the document does this representation relate?** of the Part B Representation Form. The summary indicates a part of the document to which the consultation response relates. It is acknowledged that many representations relate to numerous draft policies and/or Place Plan Areas.

**Columns 5-7:** Summarises the response to **Question 3: Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is: A. Legally compliant; B. Sound; and C. Compliant with the Duty to Co-operate** of the Part B Representation Form.

**Column 8:** Summarises the response to **Question 4: Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible** *If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments* of the Part B Representation Form. The summary identifies the main issues raised within representations. It should be noted that these responses represent the views of the relevant party and are not necessarily shared by Shropshire Council.

**Column 9:** Summarises the response to **Question 5: Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above** of the Part B Representation Form. The summary identifies the main proposed modifications raised within representations. It should be noted that these responses represent the views of the relevant party and are not necessarily shared by Shropshire Council.

**Columns 10 and 11:** Provides a high-level response from Shropshire Council to the representation and indicates if a minor modification to the draft Shropshire Local Plan is proposed in response. Please note: In some instances, a minor modification to the draft Shropshire Local Plan may be proposed which is informed by and addresses some or all of the issues raised within a representation, but it is not always possible to indicate every representation that has ultimately informed a proposed minor modification.

*Please Note: Schedule 2 of this document only provides a high-level summary of the representations received and a high-level response (in some instances due to technical constraints this may be curtailed). Appropriately redacted copies of these representations are available to view on the Shropshire Council website via the previous consultations webpage at: <https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/previous-consultations/>*

**Schedule 3:** A list of the names/agents names and unique reference (A reference) assigned to respondents.



# **Shropshire Local Plan Review**

**Schedule 1: High-level summary of the key issues raised including those of soundness, legal compliance and compliance with the duty to cooperate within the duly-made representations received on the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan**

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
General / Overarching Comments	<ol style="list-style-type: none"> <li>1. Draft Policies are inconsistent/contradictory and/or proposed allocations do not comply with draft Policies.</li> <li>2. Draft policies are not sufficiently flexible.</li> <li>3. Concerns about legibility of the draft Shropshire Local Plan.</li> <li>4. Concerns about use of Supplementary Planning Documents (SPDs).</li> <li>5. The evidence base is either out-of-date, not sufficiently robust, or incomplete (with key evidence documents missing). Reference also made to evidence from the Black Country Authorities regarding their unmet need.</li> <li>6. Key documents (including national policy/guidance) not sufficiently referenced throughout the draft Shropshire Local Plan.</li> <li>6. Evidence of compliance with Duty to Cooperate/Statements of Common Ground not available.</li> <li>7. Consultation undertaken to inform the draft Shropshire Local Plan does not comply with the Statement of Community Involvement and/or legislation/legal requirements (Gunning Principles often referenced).</li> <li>8. Responses to various stages of consultation have not been conscientiously considered.</li> <li>9. Little consideration of climate change/declared climate emergency/achieving net zero carbon. All draft Policies should be re-written to contain explicit links to the way they assist in achieving net zero carbon.</li> <li>10. Concerns about the viability of the draft Shropshire Local Plan.</li> <li>11. Wider representations on policies/sites.</li> <li>13. Support on components/draft policies of the draft Shropshire Local Plan were also expressed, but not necessarily included within the summary of comments on the relevant draft Policy.</li> <li>14. Include reference to other documents.</li> </ol>	<p>The draft Shropshire Local Plan should be read as a whole. It is considered that it provides a positive vision for the future of Shropshire; an appropriate framework for addressing housing needs and other economic, social, and environmental priorities; and a platform for local people to shape their surroundings. Draft policies are considered succinct, clearly written, complementary and effective (with appropriate flexibility offered where suitable). They are considered positive and aspirational but deliverable. They have been prepared with the objective of achieving sustainable development. They avoid unnecessary duplication and provide certainty to decision makers, communities, and the development industry.</p> <p>Supplementary documents are proposed/referenced where considered appropriate to add further detail to the policies in the draft Shropshire Local Plan. This approach also avoids unnecessary duplication.</p> <p>Shropshire Council considers that a proportionate and robust evidence base has been assembled to inform the draft Shropshire Local Plan.</p> <p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>Shropshire Council strongly considers that it has met the requirements of the Statement of Community Involvement. The consultation process undertaken is also considered to comply with the Gunning Principles and national legislation.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>Shropshire Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation and does not propose any changes.</p> <p>A Whole Plan Viability Assessment has been undertaken to inform the draft Shropshire Local Plan. Shropshire Council considers that the Whole Plan Viability Assessment undertaken to inform the draft Shropshire Local Plan is proportionate and robust.</p> <p>Wider representations on policies/sites are dealt with under the relevant draft Policy.</p> <p>Where appropriate and relevant to the planning process other documents and evidence have been reflected in Plan policies. Other matters and evidence can be material considerations in decision making on applications.</p>
Spatial Vision and Objectives	<ol style="list-style-type: none"> <li>1. Due to the Ecological and Climate Emergency should be moving towards a zero carbon economy now, with the Spatial Vision seeking to complete this transition.</li> <li>2. Request the draft Spatial Vision informs decision making or is incorporated into draft Policy SP1.</li> <li>3. Concern the draft Policies will not achieve the draft Spatial Vision.</li> </ol>	<p>The draft Shropshire Local Plan should be read as a whole. The draft Spatial Vision would be implemented through the draft Policies proposed within the draft Shropshire Local Plan, which are considered to provide an appropriate framework for managing future development proposals.</p> <p>The draft Spatial Vision recognises the importance of and identifies the need to move positively towards a zero-carbon economy. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the draft Shropshire Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>SP1. The Shropshire Test</p>	<ol style="list-style-type: none"> <li>1. Conflicts with other draft policies/proposals in the draft Shropshire Local Plan, particularly proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth).</li> <li>2. Supports allocation of specific sites/development in specific settlements.</li> <li>3. Should seek radical carbon reduction (in line with a trajectory of achieving zero carbon by 2030) and reference the climate emergency declared by Shropshire Council.</li> <li>4. Not justified as a sound basis for the development of more detailed policies in the draft Shropshire Local Plan and too open to interpretation.</li> <li>5. Suggestions on extension of the draft Policy to address issues such as level of development, distribution of development, infrastructure etc.</li> <li>6. Identified issues are addressed in other policies and there is a risk of duplication.</li> <li>7. Concerned about references to the Big Town Plan and inconsistencies between this document and the draft Shropshire Local Plan.</li> <li>8. Include reference to other documents, particularly those relating to climate change / environment.</li> </ol>	<p>The Draft Shropshire Local Plan should be read as a whole. Draft Policy SP1 is a 'gateway' policy that supplements the proposed vision and sets the context for the wider development framework within the draft Shropshire Local Plan. It is considered that the proposed vision, draft Policy DP1 and the wider development framework appropriately address such issues as enabling adaptation to climate change and positively responds to the climate emergency declared by Shropshire Council.</p> <p>It is also considered appropriate to include a 'gateway' policy in order to clearly establish the strategic issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner and ensure all proposals have consideration of them as a starting point. The remaining proposed strategic and development management policies of the draft Shropshire Local Plan then expand on these issues. As such it is considered that draft Policy SP1 is consistent with and complementary to other policies within the draft Shropshire Local Plan.</p> <p>It is considered that the proposed strategic approach to the level and distribution of development across Shropshire and the proposed strategies for specific settlements (including existing commitments (including existing allocations), proposed allocations and proposed windfall allowances) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Representations on other sites/settlements will be addressed under relevant draft Policies.</p> <p>Shropshire Council considers that draft Policy SP1 and the objectives of the Big Town Plan and its associated masterplan documents are consistent. We would note that the draft Shropshire Local Plan, if adopted, would represent the starting point for decision making in accordance with Planning law, but that the specific proposals within or resulting from the Big Town Plan would be material in decision making.</p>
<p>SP2. Strategic Approach</p>	<ol style="list-style-type: none"> <li>1. The proposed distribution of development is inappropriate - including because of a need for a greater urban focus.</li> <li>2. Need for consideration of climate change in establishing the distribution and levels of development.</li> <li>3. Representations on specific settlements - the level of development directed towards them should be either higher or lower. Some representations also suggested the need for settlement specific assessments of local housing need.</li> <li>4. Representations on the merits of including specific sites to contribute towards achieving the proposed housing and/or employment requirements. Representations also promote sites to contribute towards unmet need arising within the Black Country.</li> <li>5. The proposed housing requirement is not based on robust evidence and/or disregards responses to previous stages of consultation.</li> <li>6. The proposed housing requirement should be expressed as a minimum. It is either too high or too low - views expressed either way and various suggestions provided on how it might be amended (for instance reduced the housing requirement to align with the calculation of Local Housing Need using Government's standard methodology or increase the housing requirement to reflect the 2018-based sub-national household projections).</li> <li>7. The housing land supply is not robust and/or sufficient (including concerns regarding reliance on windfall development, amount of land proposed to be allocated for development and lack of reserve sites) and/or sufficiently flexible, and there is no detailed trajectory for housing delivery.</li> <li>8. The proposed affordable housing requirement is not based on robust evidence.</li> <li>9. The proposed affordable housing requirement is inappropriate.</li> <li>10. A proposed older person housing requirement should be identified and an appropriate strategy for their delivery included.</li> <li>11. The proposed employment land requirement is not based on robust evidence and/or disregards responses to previous stages of consultation.</li> <li>12. The proposed employment land requirement is either too high or too low - views expressed either way and various suggestions on how it might be amended.</li> <li>13. The extent of the employment land supply exceeds the proposed employment land requirement.</li> </ol>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable.</p> <p>The pattern of development proposed seeks to direct the majority of development towards urban areas, but recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, this growth in urban areas will be complemented by appropriate new development within Community Hubs (considered significant rural service centres); and to a lesser extent Community Clusters (settlements with aspirations to maintain or enhance their sustainability).</p> <p>Shropshire Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.</p> <p>The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Government's standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council also considers that it has a robust five year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. Appendix 5 illustrates this supply - identifying completions, commitments (including existing and proposed allocations) and appropriate windfall allowances (for settlements with development guidelines), which totals around 31,000 dwellings (excluding any windfall allowance for the wider rural area). The Housing Land Supply will be kept under review as part of the annual assessment of the Five Year Housing Land Supply.</p> <p>Specifically with regard to windfall allowances, given the nature of Shropshire, it is not surprising that windfall development represents a component of the housing land supply in both urban and rural areas. Shropshire is a large rural County containing the town of Shrewsbury, 17 other smaller settlements identified as Principal/Key Centres, and hundreds of other villages and hamlets. Consequently there is a constant and significant recycling of previously developed land; significant numbers of infill developments; high numbers of conversions of barns and other rural buildings; and significant delivery of affordable exception sites (which will be supplemented by the more diverse mechanisms proposed for such housing within the draft Shropshire Local Plan). The housing land supply will be kept under review through the annual five Year Housing Land Supply Assessment.</p> <p>With regard to a housing trajectory, as outlined within the proposed explanation for draft Policy SP2 "the expected rate of housing delivery over the Local Plan period is around 1,400 dwelling per annum, which is consistent with the annual housing requirement. Whilst it is acknowledged that there will inevitably be fluctuations over time, which may result in annual rates of delivery falling below or exceeding this level, it is expected that this will 'balance out' to ensure that the housing requirement is achieved. As such it is considered that this expected rate of delivery over the Local Plan period of around 1,400 dwellings per annum forms the most robust trajectory of future housing delivery in Shropshire and will be used to assess annual housing delivery." This is considered a reasonable and precautionary approach to preparing a housing trajectory. This trajectory of</p>

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	<p>14. There is not an appropriate balance between the proposed housing and proposed employment land requirements.</p> <p>15. Detailed trajectories are required for proposed allocations.</p> <p>16. Need for Statements of Common Ground.</p> <p>17. The proposed contribution to unmet cross-boundary need (housing and/or employment) is either too high or too low - views expressed either way and various suggestions provided on how it might be amended.</p> <p>18. Include an early review mechanism for circumstances where there is a shortfall of land in neighbouring areas that could be accommodated within the Plan area.</p> <p>19. The proposed methodology (Hierarchy of Settlements Assessment) for identifying Community Hubs is either inappropriate and/or has not been applied consistently. Specific settlements identified for removal or addition to the list of proposed Community Hubs.</p> <p>20. There is a need to recognise that each settlement is distinct.</p> <p>21. Definition of 'Strategic Corridors' and merits of the various 'Strategic Corridors' proposed in Shropshire.</p>	<p>future housing delivery will be annually reviewed within Shropshire Council's Authority Monitoring Report (AMR).</p> <p>In Shropshire delivery of affordable housing is a key priority, as such it is considered appropriate to seek to deliver around 7,700 affordable dwellings (equating to around 25% of the total housing requirement) during the proposed Plan period. This is considered positive and aspirational, but deliverable. Past trends on affordable housing delivery, summarised within the Strategic Housing Market Assessment (SHMA), indicate that over the last 5 years, affordable housing completions averaged around 21% of total housing completions, based on generally comparable affordable housing requirements from market housing schemes. It should be noted that affordable housing contributions from open market schemes represent only one mechanism for securing affordable housing. Other such mechanisms, as identified within the draft Policies of the draft Shropshire Local Plan, include exceptions schemes, entry-level exceptions sites, single plot exceptions sites and cross-subsidy exception schemes.</p> <p>It is considered that the draft policies within the draft Shropshire Local Plan, set a clear approach for addressing housing need in Shropshire. This includes the needs of specific groups within the community, including older people. As such, it is not considered necessary (nor is it considered a requirement of national policy), to identify specific targets for the provision of older persons accommodation within draft Policy SP2.</p> <p>The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan.</p> <p>With regard to this evidence, we would note that calculations of the employment land requirement are based on the national assumption that employment land when developed, delivers 40% net floorspace from the gross land area, and that new employment is generated on that basis. However, available evidence suggests that employment land when developed, delivers on average 25% net floorspace in Shropshire. This has been given careful consideration when determining an appropriate employment land requirement. Furthermore, we would also note that the proposed employment land requirement actually represents a reduction to that within the adopted Local Plan (whilst the housing requirement has actually increased). In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement.</p> <p>It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location, and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038.</p> <p>It is considered that an appropriate balance is achieved between the proposed housing and employment land requirements. It is important to note that the proposed employment land requirement needs to respond to numerous factors in addition to the proposed housing requirement, including: achieving key economic objectives of the strategic approach in Policy SP2, such as providing for the delivery of a growing and diverse labour force (including those which commute out of the County), and in turn supporting the delivery of an improving rate of economic growth and an increase in the productivity of the local economy; wider aspirations within the Economic Growth Strategy for Shropshire; the nature of employment development in Shropshire (including the proportion of an employment site that results in net employment floorspace); the need to off-set the re-use of existing employment land for other purposes; and the wider range of employment uses now being accepted in the draft Shropshire Local Plan.</p> <p>The proposed employment land requirement also incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan, where evidence indicates employment delivery opportunities are constrained. This reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas. Shropshire Council considers appropriate and effective consultation has been undertaken to inform the Local Plan Review and that all consultation responses have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning</p>



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		<p>policy.</p> <p>A cautious high level trajectory for proposed allocations is provided within Appendix 7 of the draft Shropshire Local Plan, based on proactive discussions with site promoters. If ultimately adopted, trajectories for sites will be kept under review as part of the Five Year Housing Land Supply Statement.</p> <p>Shropshire Council has proactively engaged in duty to cooperate discussions with relevant bodies, including relevant Local Authorities, throughout the Local Plan Review process. Statements of Common Ground will be prepared with these bodies, informed by the content of the draft Shropshire Local Plan subject to Regulation 19 consultation.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>There is a legal requirement to review Local Plans every five years (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012). Furthermore, para 33 of the National Planning Policy Framework (NPPF) states "Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future." This requirement is also specifically recognised within para 2.16 of the introduction to the draft Shropshire Local Plan. We would also note that proposed changes to the plan making process within the Planning for the Future White Paper, if ultimately introduced, could also require a review of the Local Plan. As such, it is considered unnecessary to include a specific early review mechanism within the draft Shropshire Local Plan.</p> <p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment, used to identify proposed Community Hubs, is appropriate and has been applied consistently across Shropshire. The list of proposed Community Hubs is also considered appropriate.</p> <p>It is recognised that the settlements across Shropshire are diverse, including where they perform a similar function within the settlement Hierarchy. As such the specific development strategy proposed for each settlement has been informed by consideration of the settlements characteristics, constraints, and opportunities. Shropshire Council considers that the proposed development strategies for each settlement are appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Identification of proposed site allocations and where relevant safeguarded land has been informed by a proportionate and robust site assessment process.</p> <p>Draft Policy SP14 and the associated Shropshire Economic Growth Strategy explain that 'Strategic Corridors' are the principal rail and strategic road routes through the County. These corridors are identified within the Shropshire Economic Growth Strategy and subsequently within the explanation of draft Policies SP2 and SP14 of the draft Shropshire Local Plan. The definition of and proposed 'Strategic Corridors' are considered appropriate and reflect the varied pattern of strategic corridors through Shropshire.</p>
SP3. Climate Change	<ol style="list-style-type: none"> <li>1. The policy needs to be more strongly worded to make the necessary reduction in carbon emissions and combat the climate emergency.</li> <li>2. The policy should be amended to require electric charging infrastructure in all development, increase opportunities for walking and cycling and reduce car transport</li> <li>3. The policy should reference other documents such as Shropshire Council's Climate Change Strategy and the government's 25 year Environment Plan.</li> </ol>	<ol style="list-style-type: none"> <li>1. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation and does not propose any changes.</li> <li>2. The provision of electric vehicle infrastructure is covered by Building Regulations rather than the planning system. The need to reduce traffic and encourage alternative travel options is a theme running throughout the Plan. There is an emphasis on the location of new development in existing urban centres, the wording of many policies supports pedestrian and cycling options and the Sustainability Appraisal and site assessment process contain criteria aimed at minimising car-based travel and encouraging walking and cycling. Therefore, the Council does not consider any changes are necessary.</li> <li>3. The Council's Climate Change Strategy covers issues which are primarily delivered by mechanisms other than the planning process - although the Council considers Local Plan does reflect the Strategy's priorities when they accord with national planning policy and guidance. The government's 25 year Environment Plan covers a wide range of issues and where its provisions affect the planning process, they have also been reflected in Plan policies. Accordingly, the Council does not consider it necessary to include references to either of the documents mentioned.</li> </ol>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
SP4. Sustainable Development	<ol style="list-style-type: none"> <li>1. Draft Policy SP4 does not provide a robust definition of sustainable development.</li> <li>2. The draft Shropshire Local Plan does not balance the three aspects of sustainability - social, environmental, and economic.</li> <li>3. The draft Policy represents unnecessary duplication of national policy. Some also suggested it should specify how the presumption in favour of sustainable development is to be applied locally.</li> <li>3. The proposed employment land requirement is too high.</li> <li>4. Representations on specific settlements - the level of development directed towards them should be lower.</li> <li>5. Representations on specific sites.</li> </ol>	<p>The draft Shropshire Local Plan seeks to achieve the sustainable development of Shropshire. All references to sustainable development within the draft Shropshire Local Plan recognise the three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). This is recognised within the introduction to the draft Shropshire Local Plan, which states "the pursuit of sustainable development is at the heart of the planning process" and that "achieving sustainable development will mean that decision takers must look at all facets of sustainability in arriving at decisions: economic, social and environmental. In all cases a balance of considerations is needed, and it is accepted this will often lead to a variety of opinions being expressed."</p> <p>The proposals within the draft Shropshire Local Plan have been informed by a comprehensive Sustainability Appraisal process.</p> <p>Draft Policy SP4 is not seeking to define sustainable development, rather it is providing clarity on how the presumption in favour of sustainable development introduced within the NPPF would apply, if relevant, in Shropshire.</p> <p>Shropshire Council considers draft Policy SP4 is appropriate and consistent with national policy. It is complemented by the wider draft Policies within the draft Shropshire Local Plan.</p> <p>Shropshire Council also considers that the proposed strategic approach to the level and distribution of development and the proposed development strategies for settlements is appropriate, effective, sustainable and deliverable and that the proposed development strategies for each settlement are appropriate, effective, sustainable and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Identification of proposed site allocations and where relevant safeguarded land has been informed by a proportionate and robust site assessment process.</p>
SP5. High-Quality Design	<ol style="list-style-type: none"> <li>1. High quality design should not compromise sustainability, ensure appropriate space for people and wildlife, incorporate extensive sustainable design features, and reduce carbon/water emissions (beyond solar).</li> <li>2. No reference to climate change in para 5 of the draft Policy and para 3.40 of the proposed explanation to draft Policy SP5.</li> <li>3. Include greater promotion of community engagement.</li> <li>4. More flexibility should be provided with regard to compliance with para 2 of the draft Policy.</li> <li>5. Varying representations that the design principles in the West Midlands Design Charter should be either applied more flexibly, deleted (not intended to represent local design policy and not compliant with national policy and guidance) or replaced with more Shropshire specific design requirements.</li> <li>6. Para 5 of the draft Policy should be positively worded.</li> <li>7. No reference to Neighbourhood Plans or other community led plans in the draft Policy and references in the proposed explanation exclude Village Design Statements.</li> <li>8. Specific sites comply with the principles of this draft Policy.</li> </ol>	<p>Shropshire Council considers that draft Policy SP5 is fully justified and consistent with national policy and guidance.</p> <p>Draft Policy SP5 states "Design and layout positively responds to our changing climate by taking opportunities to maximise energy efficiency (including maximising opportunities for solar gain), minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan". Furthermore the draft Shropshire Local Plan should be read as a whole and wider draft policies also address these issues - Para 3.40 recognises that planning applications should set out how they comply with... "design requirements of the other policies contained in this Local Plan", this includes design requirements of draft Policy DP11.</p> <p>It is considered appropriate to clearly state that planning permission will be refused for development of poor design and that fails to take the opportunities available for improving the character and quality of an area, the way it functions where it would adversely affect the well-being of others and where inadequate information has been submitted to demonstrate how new development will ensure the quality of design.</p> <p>Shropshire Council has adopted the West Midlands Design Charter as a material consideration to inform planning decisions and to inform policy development, notably the review of the Local Plan. The West Midlands Design Charter is not intended to set local design policies but seeks to provide a clear and consistent understanding of the West Midlands' place-making expectations, create a level playing field for developers across the region, to define 'good design quality' and indicate what is expected from developers when planning applications are submitted. As such it is considered appropriate to expect all planning applications for new development to set out how they comply with Policy SP5, the principles of the West Midlands Design Charter and comply how they comply with the design requirements of the other policies contained in this Local Plan.</p> <p>Community Led Plans are considered to be appropriately referenced within the proposed explanation of draft Policy SP5 and other draft policies/proposed explanations to draft policies. Village Design Statements are considered a form of community-led plan. However, for clarity a minor modification is proposed to the explanation to draft Policy SP5.</p>
SP6. Health and Wellbeing	No key issues were raised.	N/A

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>SP7. Managing Housing Development</p>	<ol style="list-style-type: none"> <li>1. Proposed residential development guidelines should not be 'significant' policy considerations. This is not consistent with national policy.</li> <li>2. Concern regarding potential conflict between draft Policy SP7 and draft Policy DP1. Some suggested para 3 of draft Policy SP7 should be expanded to specifically include reference to achieving the residential mix proposed in draft Policy DP1 and consider viability of development.</li> <li>3. A non-delivery assumption should be applied in the context of determining whether a proposed development guideline is to be exceeded.</li> <li>4. The draft Policy needs to take account of meeting the housing needs of different groups in the community (particular reference to affordable housing).</li> <li>5. Development of brownfield land outside development boundaries should be identified as an appropriate form of development.</li> <li>6. The scale of appropriate development (including affordable housing) should be considered.</li> <li>7. Concern about delivery of proposed allocations and/or flexibility/ability to maintain a housing land supply.</li> <li>8. Reserved sites/safeguarded land should be addressed.</li> <li>9. Promotion of specific sites/development in specific settlements.</li> <li>10. Support expressed for draft Policy SP7.</li> </ol>	<p>The purpose of the draft Shropshire Local Plan is to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations.</p> <p>However, draft Policy SP7 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such, draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.</p> <p>As such, Shropshire Council considers that draft Policy SP7 is justified, effective and consistent with national policy. Shropshire Council also considers that the existing criteria within paras 3 and 4 of draft Policy SP7 are appropriate. The draft Shropshire Local Plan should be read as a whole. As such, it is also considered that draft Policy DP1 is complementary in that it ensures the effective use of land and that the forms of housing delivered are responsive to the needs of local communities. Draft Policy DP18 specifically addresses the re-use of previously developed (brownfield) land and stipulates the circumstances within which such development will be supported.</p> <p>Shropshire Council also considers that it has a robust five year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. Appendix 5 illustrates this supply - identifying completions, commitments (including existing and proposed allocations) and appropriate windfall allowances (for settlements with development guidelines), which totals around 31,000 dwellings (excluding any windfall allowance for the wider rural area). The Housing Land Supply will be kept under review as part of the annual assessment of the Five Year Housing Land Supply.</p> <p>Draft Policy SP4 deals with circumstances where there are no policies relevant to a planning application or the policies which are most important to determining the application are out of date at the time of making the decision. A cautious high level trajectory for proposed allocations is provided within Appendix 7 of the draft Shropshire Local Plan, based on proactive discussions with site promoters. If ultimately adopted, trajectories for sites will be kept under review as part of the Five Year Housing Land Supply Statement.</p> <p>With regard to the proposed safeguarded land, it is noted that the National Planning Policy Framework (NPPF) states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development".</p> <p>Shropshire Council considers that the needs of particular groups within society have been considered and the draft Policies provide an appropriate and effective policy framework that appropriately responds to these needs (with specific regard to affordable housing, draft Policies DP3-DP7 provide an appropriate and effective policy framework for their delivery).</p>
<p>SP8. Managing Development in Community Hubs</p>	<ol style="list-style-type: none"> <li>1. Community Hub residential development guidelines should be removed and/or cross-reference to draft Policy SP7 deleted (regarding considerations in circumstances where the development guidelines are exceeded).</li> <li>2. Concerns about delivering proposed residential development guidelines.</li> <li>3. Development should be allowed on the edge of proposed Community Hubs.</li> <li>4. The proposed methodology (Hierarchy of Settlements Assessment) for identifying Community Hubs is either inappropriate and/or has not been applied consistently. Specific settlements identified for removal or addition to the list of proposed Community Hubs.</li> <li>5. Representations on proposed strategies for specific settlements.</li> <li>6. Representations on specific sites (including proposed allocations considered to contradict draft Policy SP8).</li> </ol>	<p>Draft Policy SP8 reflects the draft Shropshire Local Plan's urban development focus and strategy of focusing growth in strategically agreed locations (set out in Draft Policy SP2) whilst supporting rural communities by enabling some controlled development to maintain local sustainability.</p> <p>The purpose of the draft Shropshire Local Plan to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines for proposed Community Hubs have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations. Draft Policy SP8 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such where these residential development guidelines are to be exceeded it cross-references draft Policy SP7. Draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.</p> <p>Providing a framework for the sustainable development of Shropshire is also achieved, in part, by identifying appropriate types and locations for open market residential development, including through identification of development boundaries where it is considered appropriate to do so.</p> <p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire. The list of proposed Community Hubs is also considered appropriate.</p>



Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
		<p>However, it is recognised that the proposed Community Hubs are diverse. As such the specific development strategy proposed for each settlement has been informed by consideration of the settlements characteristics, constraints, and opportunities. Shropshire Council considers that the proposed development strategies for each settlement are appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Identification of proposed site allocations has been informed by a proportionate and robust site assessment process.</p>
<p>SP9. Managing Development in Community Clusters</p>	<ol style="list-style-type: none"> <li>1. New Community Clusters should be identified through Whole Estate Plans.</li> <li>2. The definition of infill plots should be amended - some expressed concern about implications for the design of development.</li> <li>3. The proposed methodology (Hierarchy of Settlements Assessment) for identifying Community Hubs is either inappropriate and/or has not been applied consistently. Specific settlements identified for removal or addition to the list of proposed Community Hubs and proposed Community Clusters.</li> <li>4. Provision should be made for redevelopment of brownfield sites.</li> <li>5. Representations on specific sites (including proposed allocations considered to contradict draft Policy SP8).</li> </ol>	<p>Shropshire Council considers that if new Community Clusters are to be brought forward, this should be through the Neighbourhood Plan process, rather than a Whole Estate Plan or other such mechanism. Formal Neighbourhood Plans, once made, form part of the Development Plan.</p> <p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire. The list of proposed Community Clusters and the approach to managing development within them identified within draft Policy SP9 and other relevant draft Policies is also considered appropriate.</p> <p>It is considered that the definition of infill plots provided within draft Policy SP9 is appropriate. It provides a level of certainty to local communities and the development industry about the types of sites that are suitable for such development - in terms of location, size and capacity; ensures an effective use of land; but also allows for flexibility to density, design and layout, as the referenced site size (0.1ha or less) and capacity (maximum 3 dwellings) are maximums. As such it recognises the diverse nature of Community Clusters and the settlements within them. It should also be noted that whilst draft Policy SP9 provides the starting point for decisions on infill development within Community Clusters, the draft Shropshire Local Plan should be read as a whole. As such draft Policies SP1 and SP5 apply to such sites and there will inevitably be instances where a 0.1ha site is appropriate for 3 dwellings and others where it perhaps is not.</p> <p>Shropshire Council also considers draft Policy SP9 gives appropriate consideration to brownfield land. Specifically they types of sites upon which it is proposed that residential development can occur include "conversion of existing buildings within or immediately adjoining the built form of the settlement"; and "suitable small-scale infill sites of 0.1ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings"; and "By affordable exception sites, cross-subsidy exception sites and entry level exception sites meeting evidenced need and the other requirements of Local Plan Policies." Each of these categories can of course include appropriate brownfield land. Furthermore employment development which is of a type and scale appropriate to the settlement and other non-residential development that benefits the rural community by providing required community facilities and infrastructure will be supported where it can be achieved through the reuse of existing buildings or on suitable sites within or immediately adjoining the built form of the settlement and meets other requirements of Local Plan Policy. Again, this includes appropriate brownfield land.</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy DP18 specifically addresses the re-use of previously developed (brownfield) land and stipulates the circumstances within which such development will be supported.</p>



Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>SP10. Managing Development in the Countryside</p>	<ol style="list-style-type: none"> <li>1. Insufficient flexibility to meet the needs of businesses and support their long-term future, particularly in light of increased demand due to pandemic impacts. Clarification needed regarding provisions in relation to tourism.</li> <li>2. The Draft policy (section 3a) is unjustified and inconsistent with national policy in restricting new economic development types and scale.</li> <li>3. Policy wording (para 3 ) is too restrictive and will prevent necessary rural change and innovation and not support changing land use and employment needs.</li> <li>4. Approach to re-use of buildings with heritage significance too restrictive and inflexible and provides insufficient scope for viable renovation and re-use.</li> <li>5. A number of responses identify conflict between role of countryside policy, including restricting economic development, and the proposal to allocate employment sites STC002 and P58a in countryside at Stanmore. They seek that the allocations are deleted and the countryside (and country park) at this location continues to be protected.</li> <li>6. The policy fails to refer to Whole Estate Plans. Policy should endorse appropriate development that comes forward as part of a Whole Estate Plan.</li> <li>7. The use of settlement boundaries, where they preclude otherwise sustainable development from coming forward, conflicts with NPPF objectives to boost the supply of housing. A criterion-based approach that considers additional residential schemes adjoining settlement boundaries of Shrewsbury and Principal Centres would address this.</li> <li>8. Draft Plan approach does not meet identified need or achieve sufficient delivery of required specialist housing to meet the needs of older people and other groups or self-build / custom-build housing. SP10 should allow for their provision in the countryside adjoining settlements. Alternatively, to meet need draft Policy SP10 should be amended to include specialist housing, as form of housing which will be positively considered where there is a shortage of provision.</li> <li>9. Policy allows developers to bring forward multiple, unsustainable affordable housing exception sites which may impact on local character and result in reliance on private vehicles for access to needed range of services and facilities.</li> <li>10. Insufficient detail regarding renewable energy</li> <li>11. The policy does not adequately address the impact of large intensive livestock units or set out appropriately detailed planning considerations, particularly in the AONB.</li> </ol>	<p>The draft Shropshire Local Plan is intended to be read as a whole and draft Policy DP10 provides the detailed policy context in respect of tourism. Draft SP10 recognises the countryside as a ‘living-working’ environment and provides for appropriate development to facilitate its various functions and support the sustainability of rural communities. When considering development proposals, the need to support rural vitality and the viability of countryside as an economic, as well as an environmental, resource will be a significant consideration. It is therefore considered that the draft Shropshire Local Plan includes an appropriate draft strategy and draft policies relating to tourism development.</p> <p>Draft Policy SP10 reflects the Draft Plan’s urban development focus and strategy of focusing growth in strategically agreed locations (set out in Draft Policy SP2) whilst supporting rural communities by enabling some controlled development to maintain local sustainability. However, part 3 of draft Policy SP10 is positively phrased and thus allows for the consideration of other development which is not listed on its sustainability merits. As such it is considered that the broadening of the criteria by removing reference to small-scale is unnecessary and would undermine the proposed strategic approach within the draft Shropshire Local Plan and the plan led approach to managing development in Shropshire.</p> <p>The draft policy is sufficiently flexible and appropriate to include consideration of maintenance or enhancement of countryside vitality and character in the context of proposals for sustainable employment, tourism, leisure, other business and community development proposals in the countryside.</p> <p>Part 4d of the Draft Policy reflects local and national policy aims in respect of heritage assets. It also seeks to more broadly safeguard the character of buildings and the countryside. The draft policy does not necessarily preclude sympathetic alterations and extensions but expects that individual proposals would be considered on their merits as clarified by the draft policy explanatory text.</p> <p>Comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than soundness of draft Policy SP10 itself. Comments are provided separately in the relevant settlement section on the appropriateness of the development strategy and proposed allocations for Bridgnorth.</p> <p>Draft Policy SP15 specifically relates to Whole Estate Plans, referencing their role as non-statutory plans produced by Estates. Whilst not specifically referenced in Draft Policy SP10, the draft Shropshire Local Plan is intended to be read as a whole, and the relevant considerations of all other applicable policies will need to be taken into account in decision making on planning applications</p> <p>The Policy reflects the Draft Plan strategy of achieving a sustainable and appropriate pattern of development through new development focused in the urban areas. Accordingly, a wide range of allocations and other opportunities are provided by the Draft Plan for all types of housing within settlements. In line with the Plan’s strategy SP10 seeks to strictly control new market housing outside development boundaries. This reflects the approach set out in national policy which seeks to direct new housing development away from isolated rural locations to places where it will support the role of existing settlements and their communities.</p> <p>Affordable housing exception schemes in appropriate locations are enabled by a range of policies in the draft Plan as sustainable housing solutions to meet recognised local housing needs which can include specialist affordable housing and affordable self-build dwellings. DP1 makes provision for specialist older person accommodation in settlements in a way which is integrated with broader market provision in communities, recognising the benefits of access to services and facilities, including healthcare, which may be less accessible in countryside locations. Allowing open market dwellings or older person accommodation in the countryside is unnecessary and would undermine the proposed strategic approach and the plan led approach to managing development in Shropshire.</p> <p>SP10 facilitates exception schemes but does not set out the detailed approach. Issues raised are therefore more appropriately considered in relation to the wording and operation of exception policies DP3, DP4, DP5, DP6 &amp; DP7 .</p> <p>It is considered that the approach taken to renewable energy in policy DP26 Strategic Infrastructure, as well to climate change and reducing carbon emissions more generally throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation</p> <p>Requirements are identified for large scale new development, with separate criteria for agricultural developments and other policies, including Draft AONB Policy DP24, signposted. The draft Shropshire Local Plan is intended to be read as a whole. Therefore, in addition to the criteria set out in Draft Strategic Policy SP10, the relevant considerations of all other applicable policies will need to be taken into account in decision making on planning applications, along with other material considerations which can include other plans such as the AONB Management Plan which is directly referenced in draft Policy DP24.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>SP11. Green Belt and Safeguarded Land</p>	<ol style="list-style-type: none"> <li>1. A number of responses identify conflict between role of Green Belt policy and the proposal to allocate employment sites STC002 and P58a in Green Belt at Stanmore. Seek that the allocations are deleted, and Green Belt continues to be protected.</li> <li>2. A number of responses identify conflict between role of Green Belt policy and proposals to release Green Belt land for safeguarding and allocating at Shifnal.</li> <li>3. Concern about harm to and loss of Green Belt, unacceptable where removal for allocation or safeguarding would cause a moderate or above risk of harm and that the draft Policy should be amended to reflect this, and relevant site allocations deleted</li> <li>4. Exceptional circumstances are not/not adequately demonstrated for proposed release of Green Belt.</li> <li>5. Green Belt land release not justified as all reasonable options for development have not been assessed. Alternative non-Green Belt sites are available</li> <li>6. Development strategy not appropriate</li> <li>7. More appropriate and sustainable sites are available for allocation, site selection not appropriate or justified. Additional/alternative site allocations and/or safeguarded land proposed - suggestions these are more suitable and sustainable than those proposed</li> <li>8. Identification of safeguarded land not justified in the evidence base.</li> <li>9. Approach to Green Belt release is over-cautious. More land should be safeguarded/allocated to meet needs.</li> <li>10. Inclusion of specified site as an allocation is appropriate and justified.</li> <li>11. Consideration of compensatory improvements to remaining Green Belt when undertaking the site assessment and identification process has been insufficient.</li> <li>12. Land removed from the Green Belt should follow biodiversity net gain principles.</li> <li>13. Very special circumstances should require demonstration of impact of lost food production and carbon absorption and biodiversity loss</li> <li>14. Draft Policy does not facilitate the strategic approach proposed, including increased housing and employment requirements to accommodate unmet needs arising in the Greater Birmingham and Black Country Housing Market Area. Therefore, does not address relevant cross-boundary strategic matters.</li> <li>15. Green Belt Study methodology defective &amp; needs revising. Evidence results in inappropriate outcomes and flawed conclusions regarding site harm assessment. Alternative methodology would support allocation of other locations.</li> <li>16. Insufficient reference to safeguarded land. Approach inconsistent with NPPF, which requires policies to reflect changes in demand for land. A mechanism should be included in draft Policy SP11 which allows safeguarded sites to be bought forward in the Plan period.</li> <li>17. Draft Policy SP11 needs to be amended to comply with the NPPF &amp; allow reuse of previously developed land within the Green Belt for open market housing. Also, NPPF allows for up to substantial harm in the Green Belt where affordable homes are being provided in an area of affordable housing need.</li> </ol>	<p>Noted. A number of representations primarily relate to specific proposals for Green Belt release and/or the proposed settlement development strategies for settlements, including Albrighton, Bridgnorth, RAF Cosford &amp; Shifnal, rather than the content of draft Policy SP11. Also reference to strategic approach and sites needed to contribute to cross-boundary need. Although it is also sought that the draft Policy SP11 should be amended to not allow Green Belt release removal for allocation or safeguarding where it would cause a moderate or above risk of harm.</p> <p>The proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. It is also considered that the proposed development strategies and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable, and deliverable. In identifying proposed site allocations, a robust and comprehensive site assessment process has been undertaken, which included consideration of any harm that would result from releasing a site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. In accordance with national policy safeguarded land is identified to meet needs beyond the current Plan period. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances and compensatory improvements to the remaining Green Belt are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement is available on the Shropshire Council Evidence Base page.</p> <p>Harm of release is a significant consideration, but other factors must also be taken into account as described in the Policy explanatory text.</p> <p>Achieving biodiversity net gain is provided for in draft Policy DP12</p> <p>The approach to establishing whether 'very special circumstances' exist outlined within draft Policy SP11 and the National Planning Policy Framework (NPPF) is appropriate.</p> <p>It is considered that the Draft Policy appropriately reflects national policy and the Draft Plan strategy of achieving a sustainable and appropriate pattern of development. A wide range of allocations and other opportunities are provided by the Draft Plan to bring forward appropriate new development. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, as a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs. The methodology used within the Green Belt Assessment and Review undertaken to inform the Local Plan Review is considered appropriate, proportionate and robust.</p> <p>The Policy is consistent with the NPPF, planning permission for the permanent development of safeguarded land should only be given following an update to a plan which proposes its development.</p> <p>Draft Policy SP11 identifies circumstances when development may be acceptable in line with National Policy, whilst also providing appropriate additional clarification in the Shropshire context. Para 5 of the draft Policy seeks to enable appropriate reuse of previously developed land to meet identified local affordable housing need, 'where it can be demonstrated not to cause substantial harm to the openness of the Green Belt'. This proposed policy requirement is consistent with the proposed strategic approach to development( within draft Policy SP2 ) which states that outside identified settlements, 'new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification' and the proposed Policy approach for countryside within draft Policy SP10. This proposed approach is consistent with that within the adopted Local Plan.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>SP12. Shropshire Economic Growth Strategy</p>	<ol style="list-style-type: none"> <li>1. Comments that there should be an allowance for sites to come forward which are not windfall, provided they relate to sustainable development, climate change and any relevant land status. Employment land requirement should be decreased and align employment levels with the housing.</li> <li>2. Comments that allocations in Stanmore should be removed as they are in Green Belt land</li> <li>3. Comments on the lack of justification of the selection of sites over those which are not allocations in the Local Plan.</li> <li>4. Comments on the deletion of the policy and removal of RAF Cosford as a Strategic Site.</li> <li>5. Comments requesting the inclusion of addressing business carbon emissions, as well as requesting wording changes in relation to the carbon emergency</li> <li>6. Alternative/additional sites should be allocated for employment</li> <li>7. A cross reference to Whole Estate Plans (Policy SP15) , and their role in facilitating such development, should be made within Policy SP12, to ensure clarity in future decision making.</li> <li>8. It is important that the draft policy considers recent amendments to the use class order, and that employment generation isn't restricted to just the old B uses. A number of different commercial uses such as care homes and nurseries, for example, can employ a greater number of employees that some traditional B uses.</li> </ol>	<ol style="list-style-type: none"> <li>1. Shropshire Council considers that the proposed strategy for supporting economic growth, development, and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable, and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible, and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. It is considered that an employment land provision at Junction 3 of the M54 Motorway is not required during this Plan period to 2038. The employment policies SP12, SP13 and SP14 would still be sufficiently flexible to accommodate such an outcome in the event that the circumstances determining the strategy for the Local Plan were to change considerably during the Plan period.</li> <li>2. Shropshire Council considers that the draft Policies of the draft Shropshire Local Plan are consistent and together provide an appropriate vision and framework for the future development of Shropshire to 2038; address needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seek to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</li> <li>3. Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt including land at Shifnal proposed to be allocated for employment development and land proposed to be safeguarded for consideration in future plans for the growth and development of the town.</li> <li>4. Shropshire Council considers that the proposed strategy for supporting economic growth, development, and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable, and deliverable.</li> <li>5. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.</li> <li>6. Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt including land at Shifnal proposed to be allocated for employment development and land proposed to be safeguarded for consideration in future plans for the growth and development of the town.</li> <li>7. The Local Plan should be read as a whole, and any planning application made would need to adhere to all of the relevant policies</li> <li>8. The draft Shropshire Local Plan should be read as a whole. It is considered that draft Policies SP12 and other relevant policies such as draft Policy SP13 and SP14 appropriately consider and provide a framework for consideration of employment generating uses. Policy SP13 refers to the correct use classes as defined in the amendments of Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020</li> </ol>



Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>SP13. Delivering Sustainable Economic Growth and Enterprise</p>	<ol style="list-style-type: none"> <li>1. Policy SP13 is supported for the employment land requirement provided it is delivered in a flexible manner particularly with regard to Community Hubs (including site HWK014) and the regard for the impacts of employment development on the historic environment and the identification of clear economic growth aspirations. SP13 should provide greater flexibility to redevelop existing employment sites for alternative uses including site SHR203 in Shrewsbury.</li> <li>2. Policy SP13 is considered to be unsound because the employment land requirement is not justified and should be significantly reduced (to 165 - 196ha) and the policy advocates employment allocations that are not appropriate including RAF Cosford, STC002 and P58a at Bridgnorth where the key issues for delivering sustainable economic growth should be identified.</li> <li>3. Land at Junction 3 is considered to be necessary for inclusion in the strategic supply of employment land to provide choice and competition in the market and meet an identified need in the logistics and manufacturing sector and to support the Economic Growth Strategy and the growth aspirations of the wider area.</li> <li>4. Draft policies relating to economic development must be sufficiently flexible to allow businesses to respond to the changing economic circumstances in Shropshire and the national economy.</li> <li>5. Update requested for the use classes referenced in the Policy to reflect the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.</li> <li>6. Clarification / amendment requested for the Policy at criteria 3(b) and 7 and the Explanation at paragraph 3.134.</li> <li>7. A general economic development policy is requested to replace SP13 to state any windfall/significant development that cannot be accommodated within a settlement, would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land.</li> </ol>	<p>The economic strategy in the draft Shropshire Local Plan seeks to balance new economic development and employment generation with the delivery of new housing, focused within the strategic and principal urban centres of Shrewsbury, the Market Towns and Key Centres of the County. This balance between the two principal aims of the draft Local Plan seeks to ensure that key economic objectives of the strategic approach in Policy SP2 will be met: providing for the delivery of a growing and diverse labour force; and in turn, supporting the delivery of an improving rate of economic growth and an increase in the productivity of the local economy. This balancing approach in the spatial strategy for new economic development and employment generation targets new economic development opportunities principally into Shrewsbury and the principal centres with an increase in provision in the east of the County. This will improve the economic potential of the County particularly within significant commuting locations with higher concentrations of resident labour and with higher levels of skills and academic attainment. This increased urban focus in the economic strategy of the draft Local Plan also seeks to capture the greater opportunity in urban markets to achieve more efficient development of employment land. This is expected to deliver higher proportions of developed floorspace and employment from the land that is developed in the County. This urban focused strategy will also locate a greater proportion of the new employment development into those urban centres located along the strategic corridors through the County, helping to improve the accessibility and sustainability of Shropshire's key employment locations over the plan period to 2038. This is expected to assist in retaining more of the County's resident labour force and helping to improve the productivity of the Shropshire economy. The increased concentration of new economic development and employment generation in the centre and east of the County will also enable Shropshire to increase its profile and investment offer beyond the County boundary. This will be achieved by providing a broader range and choice of both housing and economic development opportunities that are accessible to other key economic and employment markets. This will include locations in the sub-regional area, in need of additional support to meet their own economic needs and demands, which will further help to improve the economic growth potential of the County.</p>
<p>SP14. Strategic Corridors</p>	<ol style="list-style-type: none"> <li>1. Policy SP14 is supported as a 'strategic' policy, for identifying the A41 and A458 as 'strategic corridors', recognising the economic role and function of Oswestry, Bridgnorth, Ludlow and Craven Arms and for recognising the impacts of employment development on the historic environment.</li> <li>2. SP14 should state an explicit preference for development sites that have rail connectivity.</li> <li>3. SP14 states that development in the 'strategic corridors through the Green Belt or Shropshire Hills Area of Outstanding Natural Beauty will be subject to appropriate national and local policy which conflicts with the allocation of employment land in the Green Belt at Shifnal because exceptional circumstances to justify the Green Belt release in this area has not been provided throughout the review process.</li> <li>4. Evidence for the function of M54 as a strategic corridor is considered to advocate the role of M54 Junction 3, RAF Cosford, additional housing in Albrighton and the release of site SHF032 from the Green Belt for housing development in Shifnal.</li> <li>5. Development in the A5 corridor around Shrewsbury should not be permitted to affect the Oxon Hall caravan park.</li> <li>6. Much Wenlock should not be considered as a settlement in the strategic corridor through the eastern belt of Shropshire as this conflicts with the Neighbourhood Plan for Much Wenlock.</li> <li>7. Clarification / amendment requested for the Policy in criteria 2, 3, 4 and 4a and the Explanation at paragraphs 3.142, 3.144 and 3.145.</li> <li>8. A general economic development policy is requested to replace SP14 to state any windfall/significant development that cannot be accommodated within a settlement, would be considered on its own merits having regard to the need for</li> </ol>	<p>Shropshire Council considers that Policy SP14 and the employment development strategy for Shropshire is appropriate, effective, sustainable, and deliverable. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local Plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. In relation to the release of additional greenfield sites through the Local Plan, it is considered that sufficient flexibility has been accorded to the release of such sites along the strategic corridors. In articulating the strategic approach for the Local Plan, Policy SP14 recognises that the County has significant areas within the Green Belt and the Shropshire AONB, and a high quality environment with a rich biodiversity, landscape and historical heritage that must be afforded appropriate protection. Consequently, further development in the 'Strategic Corridors' beyond those sites already committed or proposed to be allocated for development will be determined through a sequential preference for principal settlements, strategic sites (and strategic settlements see Minor Modifications) and brownfield redevelopment opportunities with greenfield land releases to be considered only in exceptional circumstances where the benefits of the proposal will clearly justify the development of greenfield land.</p>

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	<p>the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land.</p>	
<p>SP15. Whole Estate Plans</p>	<ol style="list-style-type: none"> <li>1. There is no evidence/justification to support recognising Whole Estate Plans as material planning considerations (no Whole Estate Plans are provided as evidence for this draft Policy).</li> <li>2. Objections to recognising Whole Estate Plans as material planning considerations.</li> <li>3. Need for clarity on the relationship of draft Policy SP15/Whole Estate Plans with the other policies in the draft Shropshire Local Plan - concern expressed about Whole Estate Plans being subject to less public consultation and/or sustainability appraisal and used to circumvent wider policy requirements.</li> <li>4. Define estate or specify minimum size for an estate.</li> <li>5. Requirement for Whole Estate Plans to complement and be consistent with the objectives and policies of the Local Plan should be removed or amended to require general conformity/conformity with strategic objectives.</li> <li>6. Whole Estate Plans should be significant material considerations, rather than simply material considerations within the Planning process.</li> <li>7. Unclear what meaningful consultation entails/this should be agreed with Shropshire Council.</li> <li>8. The draft Policy should specify specific considerations for Whole Estate Plans.</li> </ol>	<p>Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets.</p> <p>The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal.</p> <p>Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.</p> <p>Shropshire Council considers that it is appropriate for Whole Estate Plans to be endorsed by the Council and used as a material consideration in decision making to:</p> <ul style="list-style-type: none"> <li>-Have objectives, policies and land use proposals that complement and are consistent with the objectives and policies of the Local Plan.</li> <li>-Have been subject to meaningful public consultation.</li> </ul> <p>Meaningful public consultation will depend on the nature, scope and context of the Whole Estate Plan.</p> <p>The amount of weight that can be applied to Whole Estate Plans that represent material considerations within the Planning process will be determined by the decision taker as it depends on the nature, scope and context of the Whole Estate Plan.</p> <p>It is not considered appropriate to include specific considerations for Whole Estate Plans, as this list could be very extensive and the documents themselves will inevitably be diverse and varied.</p> <p>It is not considered that a definition of an Estate need to be specifically provided within the draft Shropshire Local Plan.</p>
<p>SP16. Strategic Planning for Minerals</p>	<ol style="list-style-type: none"> <li>1. Minerals arising in Shropshire are used beyond the Local Authority area.</li> <li>2. Duplication within draft Policy SP16 and draft Policy DP30.</li> <li>3. Level of provision of aggregates should be based on the 10 years sales average of 0.68 million tonnes (consistent with national policy). Any adjustment based on "other relevant local information" should subsequently be explained.</li> <li>4. Potential conflict between para 4 of draft Policy SP16 and para 3.158 of the proposed explanation to draft Policy SP16 regarding windfall sites coming forward to meet demand.</li> <li>5. Potential conflict between sand and gravel windfall allowance and strict policy controls within draft Policy SP16 - explanation required.</li> <li>6. Reference to broad locations should state saved allocations.</li> <li>7. Site restoration should follow principles of Biodiversity Net Gain and consider opportunities for habitat creation and flood water storage.</li> <li>8. Concerns about impact of mineral working on the water environment.</li> <li>9. Where both a Planning Application and Environmental Permit Application for mineral sites with waste recovery/landfilling are required, twin-tracking should be encouraged.</li> <li>10. Specified proposed allocations should be removed from mineral safeguarding areas.</li> </ol>	<p>Shropshire Council considers that the draft Mineral Policies provide an effective framework for ensuring a sufficient supply of minerals and to manage mineral development proposals.</p> <p>Draft Policies SP16 and DP30 are intended to be complementary. As such a minor modification is proposed to para 4 of draft Policy SP16 to clarify this.</p> <p>Consider the approach proposed to the level of aggregate provision is sound in that it reflects local circumstances and well-rehearsed industry concerns that planning on the basis of a 10 year average does not properly reflect local circumstances in the West Midlands. The rationale for the proposed approach is clearly identified as part of the LAA / Minerals Technical Background report (Para 17) and paragraph 3.157 of the explanation to draft Policy SP16.</p> <p>For the purpose of clarity a minor modification is proposed to the proposed explanation to draft Policy SP16 to cross-reference the appropriate section of the Minerals Technical Background Paper. A minor modification is also proposed regarding reference to broad locations, which should reference saved SAMDev Plan mineral allocations.</p> <p>With regard to para 4 of draft Policy SP16, we would note that draft Policy DP30 clarifies that mineral working falling outside allocated areas will also be permitted where developers can demonstrate that the proposal would meet an unmet need/prevent sterilisation of resources; and not prejudice development of allocated sites/result in significant environmental benefits as a result of the exchange or surrender of existing permissions or the site might be significantly more acceptable overall than the allocated sites, and would offer significant environmental benefits. Shropshire Council is confident the scale of windfall development proposed will be delivered since this largely comprises extensions to existing sites. Reinforcing this, a new site for 1.9mt at Ironbridge / Buildwas has recently benefitted from a resolution to grant planning consent.</p> <p>The draft Shropshire Local Plan should be read as a whole. Para 4.274 of the proposed explanation to draft Policy DP31 recognises that restoration and aftercare of mineral sites provides positive opportunities to deliver environmental or community benefits. It also recognises that we therefore need to establish policies to support mineral working which helps to secure locally sensitive design and to ensure that high quality restoration and aftercare of mineral sites takes place at the earliest opportunity and, wherever possible, helps to secure green infrastructure or environmental and community benefits identified in the relevant local Place Plan. Draft Policy DP12 addresses biodiversity net gain, it includes "Ensuring that all development delivers at least a 10% net gain for biodiversity in accordance with the Environment Act, any future Local Nature Recovery Strategy (LNRS) and policies DP14, DP15, DP16 and DP22." Site-specific proposals/opportunities are most appropriately addressed as part of the Planning Application process. Protection of the water environment is addressed within para 4.272 of the explanation to draft Policy DP31. It recognises that mineral working must not have an unacceptable adverse impact on the natural and historic environment or human health. It also includes specific requirements with regard to the water environment including the need for early consideration, a hydro-geological risk assessment, groundwater level monitoring well in advance of any Planning Application, a water features survey and long-term monitoring programme for the water</p>



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		<p>environment.</p> <p>The minor modification proposed to para 4.280 of the explanation to draft Policy DP32 addresses opportunities for twin-tracking with waste permitting.</p> <p>Proposed allocations, have been informed through a proportionate and robust site assessment process, which included consideration of mineral safeguarding. Para 4.264 of draft Policy DP29 (to which draft Policy SP16 cross-references in the context of mineral safeguarding) states "Non-mineral development which is exempt from the requirements of this Policy comprises:... Applications that are in accordance with the development plan and site allocations where the assessment of site options took account of potential mineral sterilisation and determined that prior extraction was not required".</p>
<p>SP17. Waste Management Infrastructure</p>	<p>1. Policies should reflect the waste hierarchy.</p> <p>2. Where both a Planning Application and Environmental Permit Application for waste management facilities are required, twin-tracking should be encouraged.</p>	<p>Where evidence indicates that waste production will increase draft policies are required to ensure that there is sufficient capacity to manage this additional waste, as recognised within para 3.164 of the Explanation to draft Policy SP17. Waste Management Infrastructure.</p> <p>See response to draft Policy DP32 with regard to twin-tracking Planning Application and Environmental Permit Application for waste management facilities.</p>
<p>DP1. Residential Mix</p>	<p>1. Evidence is insufficient (including in relation to need and viability) or fixed in time so does not support aspects of draft Policy DP1, including the proposed residential mix for sites of 5 or more dwellings, requirements for affordable housing to achieve nationally described space standards, requirements relating to M4(2) accessible and adaptable dwellings/M4(3) wheelchair user dwellings, and requirements for provision of specialist housing for the elderly/disabled on sites of 50 or more dwellings.</p> <p>2. Elements of the draft Policy are inconsistent with national policy, including the proposed residential mix for sites of 5 or more dwellings, requirements for affordable housing to achieve nationally described space standards, requirements relating to M4(2) accessible and adaptable dwellings/M4(3) wheelchair user dwellings, and requirements for provision of specialist housing for the elderly/disabled on sites of 50 or more dwellings.</p> <p>3. The draft Policy is overly prescriptive and there is a need for greater flexibility within it, particularly with regard to the proposed residential mix for sites of 5 or more dwellings.</p> <p>4. References to Right Homes Right Place surveys (or equivalent) is inappropriate as these are snapshots in time, the methodology is not sufficiently robust and they are not subject to consultation.</p> <p>5. The approach to provision of older peoples housing is either unnecessary, inappropriate, unclear, or insufficient (including failure to identify a specific total requirement for older peoples housing).</p> <p>6. Concerned about conflict between this draft Policy and others within the draft Shropshire Local Plan, particularly with regard to the proposed residential mix for sites of 5 or more dwellings.</p>	<p>Shropshire Council considers the proposed requirements of draft Policy DP1 positively respond to and are justified by the evidence base prepared to inform the draft Shropshire Local Plan, including the Strategic Housing Market Assessment (SHMA), Whole Plan Viability Assessment, the Shropshire HomePoint Housing Waiting List and the 'Right Home Right Place' Local Housing Need Surveys. The evidence base is considered proportionate and robust. It is also considered that these proposed requirements are consistent with national policy and consistent with and complement the wider draft Policies within the draft Shropshire Local Plan, which should be read as a whole.</p> <p>With regard to the proposed residential mix for sites of 5 or more dwellings, it is considered that para's 2a/b of draft Policy DP1 provide an appropriate balance between ensuring new development includes an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) and also allowing flexibility for innovation within development. Specifically, flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand.</p> <p>The approach proposed within para 2a of draft Policy DP1 allows for the residential mix on a site to positively respond to the most recent information on local housing need for communities, where in the last 5 years a Local Housing Need Survey has been undertaken under either the Right Home Right Place Council-led initiative or an equivalent survey endorsed by Shropshire Council.</p> <p>The mix proposed within para 2b of draft Policy DP1 is informed by the SHMA, which indicates a significant proportion of new dwellings required during the proposed Plan period will be 1, 2 and 3 bedrooms in size. Specifically, the SHMA indicates around 32.7% of the dwellings needed will be 1 or 2 bedrooms in size and a further 43.5% will be 3 bedrooms in size. This demand for 1, 2 and 3 bedroom dwellings also reflects the view often expressed by local communities when discussing their local housing needs.</p> <p>The approach to nationally described space standards proposed within Para 3 of draft Policy DP1 is considered to positively respond to the evidence available within the SHMA and other sources. Providing dwellings with sufficient internal floorspace positively contributes to the future occupier's ability to achieve a high-quality of life and is responsive to changing household requirements, by increasing the ability to include adaptations at a later date.</p> <p>The requirements relating to M4(2) accessible and adaptable dwellings/M4(3) wheelchair user dwellings within paras 4 and 5 of draft Policy DP1, the SHMA identifies that growth in the number of older persons' households is a key feature in the population and household change projected to occur in Shropshire over the Local Plan period from 2016 to 2038. It calculates a total need for M4(2) and M4(3) housing equivalent to 77% of total household growth (of which M4(3) constitutes around 13%). It is recognised that part of this need can be met within specialist accommodation, however Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible. As such Shropshire Council considers the SHMA justifies requirements for all housing specifically designed for the elderly to achieve M4(3) standard and the proposed thresholds for M4(2) and M4(3) standard dwellings on sites of 5 or more dwellings.</p> <p>The requirements relating to provision of specialist housing for the elderly and those with disabilities/special needs on sites of 50 or more dwellings in para 6 of draft Policy DP1 is also considered appropriate. The National Planning Policy Framework (NPPF) specifies housing needed for different groups in the community should be assessed and reflected in planning policies, this includes the needs of older people and those with disabilities. The SHMA indicates growth in the number of older persons' households is a key feature in the population and household change projected to occur in Shropshire over the proposed Plan period. It also identifies a specific need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision. In order to ensure the needs of older people are met, it is considered appropriate to require larger sites of 50 or more dwellings to include an appropriate range of specialist housing designed to meet the diverse needs of older people as this will ensure inclusive and sustainable communities. However, it is</p>

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		<p>recognised that sites of 50 or more dwellings will be diverse in nature and it is for this reason that a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors. It is also considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically:</p> <ul style="list-style-type: none"> <li>-Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings.</li> <li>-Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people.</li> <li>-Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation.</li> </ul>
DP2. Self-Build and Custom-Build Housing	<ol style="list-style-type: none"> <li>1. No justification for requirement to provide 10% of plots on residential schemes of 5 or more dwellings (or 0.5ha in size) as serviced plots for self-builders or custom-builders.</li> <li>2. Requirements of the draft Policy are unclear.</li> <li>3. There is no demand for self-build or custom-build plots on larger development sites and such provision could be inappropriate, impacting on viability, delivery timescales/site management, and future residents of other plots.</li> <li>4. Access requirements for self-build and custom-build plots could be problematic.</li> <li>5. Timescales for marketing of self-build and custom-build lots should be reduced (with many referencing 36 months as the current requirement).</li> <li>6. To meet need, the draft Policy should allow for self-build and custom-build sites within the countryside (adjoining settlement development boundaries) and/or allocate sites specifically for self-build and custom-build development.</li> <li>7. Do not consider the self-build register is a robust evidence to inform need for self-build and custom-build plots. Need should be considered on a settlement rather than County basis.</li> </ol>	<p>Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position whilst also providing appropriate flexibility regarding provision on large development sites. The proposed requirements for where such provision is made are also considered appropriate, including the timescales for marketing of self-build and custom-build plots, access requirements and phasing of these plots within a development.</p> <p>It is considered that the proposed approach within draft Policy DP2, alongside other relevant policies relating to residential development in the draft Shropshire Local Plan, will effectively meet the diverse need for self-build and custom-build development. It is important to note that open market self-build and custom-build development is a form of open market residential development. It is also important to note that Shropshire is already delivering significant volumes of self-build plots, using a policy approach which is generally consistent in relation to small sites, whilst the proposed approach in relation to large sites creates an opportunity to complement this provision both in terms of numbers and types of plots, again to effectively meet the diverse need for self-build and custom-build development.</p> <p>The Self-Build Register is considered a robust source of information for determining self-build housing need and is referenced as such within National Planning Practice Guidance (NPPG).</p>

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<p>DP3. Affordable Housing Provision</p>	<ol style="list-style-type: none"> <li>1. The proposed housing requirement should be increased to deliver more affordable housing.</li> <li>2. There is no definition of affordable housing and no affordable housing delivery target (or sub-target for affordable rent).</li> <li>3. The affordable housing rates should be either increased or reduced. Specific references for reductions made to development in the north, all/larger sites in the south and specialist accommodation for older people.</li> <li>4. Detailed requirements of the draft Policy are inflexible. They are better addressed through a Supplementary Planning Document and/or discussions at the Planning Application stage/S106 Legal Agreements.</li> <li>5. The proposed affordable housing tenure mix contradicts national policy.</li> <li>6. Requirement for transferring affordables to Registered Providers should be more graduated.</li> <li>7. Reference to exceptional circumstances for off-site and/or financial contributions contradicts national policy.</li> <li>8. Referencing to pepper-potting should be amended to allow for groups of affordable dwellings.</li> <li>8. Reference to Shropshire Council's Allocation Policy should be removed.</li> <li>9. Reference to affordable dwellings being in perpetuity and caps on staircasing/rents should be removed.</li> <li>9. Need to reference use of Open-Book Viability Assessment for Specific Sites to determine appropriate contributions.</li> <li>10. Need to include greater recognition of importance of accessible natural green space for occupiers of affordable housing.</li> <li>11. No dwelling mix is provided for affordable housing.</li> <li>12. Viability of specific settlements/sites.</li> </ol>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Draft Policy SP2 provides an affordable housing delivery target (this does not distinguish between the different types/tenures of affordable housing as it is not considered appropriate or necessary to do so). It is considered that the proposed affordable housing delivery target effectively responds to the significant affordable housing need identified in Shropshire and best available information on development viability, from within the Shropshire Viability Study. The draft Shropshire Local Plan also introduces a range of mechanisms to support the delivery of affordable housing.</p> <p>Shropshire Council also considers that the proposed affordable housing contributions are appropriate. They respond to the significant affordable housing need identified in Shropshire and best available information on development viability, from within the Shropshire Viability Study. We would note that para 2 of draft Policy DP3 states "The provision of reduced rates of affordable housing due to viability concerns on otherwise sustainable schemes will be considered in exceptional circumstances where evidence is clearly presented and agreed by the Council. In these circumstances an overage clause will be sought in order to secure the potential for future contributions towards affordable housing." The detailed requirements identified within draft Policy DP3 are also considered appropriate and provide certainty to all including the decision maker, development industry and local communities. With regard to specific requirements:</p> <ul style="list-style-type: none"> <li>-The proposed affordable housing tenure split effectively responds to evidence on affordable housing needs, as summarised within para 4.52 of the explanation to draft Policy DP3. It also provides flexibility for alternative tenure splits where local need would support this. It is evidenced that there is significant need for affordable housing for rent in Shropshire, the delivery of which would be prejudiced by the application of a standard 10% affordable home ownership requirement. The draft policy approach to tenure thus complies with NPPF (para 64) which expects at least 10% of the homes to be available for affordable home ownership, "unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs".</li> <li>-The requirement to demonstrate exceptional circumstances to justify off-site or financial contributions in lieu of on-site contributions is consistent with national policy (reflects Para 62 of the National Planning Policy Framework requirement which expect on site provision unless a financial contribution in lieu can be robustly justified or that "the agreed approach contributes to the objective of creating mixed and balanced communities").</li> <li>-The requirement for affordable dwellings to be transferred to a Registered Provider as soon as possible, and no later than at completion of 50% of the consented market housing" reflects the current established approach, is appropriate, provides certainty to all parties (including the community, development industry and decision maker) and ensures the timely delivery of affordable housing. Implementation is able to reflect the phased development of larger sites.</li> <li>-It is considered appropriate to specify that affordable housing provided on-site will be allocated in accordance with Shropshire Councils Allocations Policy.</li> <li>-It is considered appropriate to require affordable housing to be appropriately pepper-potted through a site.</li> <li>-Requirements for affordability in perpetuity and limitations on staircasing reflect that significant need and established approaches, securing a range of affordable housing which is meeting continuing need beyond that of initial occupants. A Housing Supplementary Planning Document will support housing policies and provide further guidance.</li> </ul> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy DP15 provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace.</p> <p>Draft Policy DP3 specifies the tenure mix expected from affordable housing provision as part of market housing development. Draft Policies DP4, DP5 and DP7 indicate that the type, size, and tenure of affordable housing should meet local housing needs evidenced in housing need surveys. Whilst Draft Policy DP6 is a mechanism for delivering affordable dwellings for the specific applicant and such dwellings are expected to be designed to meet the current and future households needs (within a maximum dwelling size).</p>



Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>DP4. Affordable Housing Exception Schemes</p>	<p>1. Policy allows developers to bring forward inappropriate sites in countryside and in other unsustainable locations with insufficient infrastructure where access to services and facilities dependent on private vehicle availability. Availability of local employment, services &amp; facilities and more extensive sustainable travel opportunities should be required.</p> <p>2. Policy allows developers to bring forward multiple sites which may have significant cumulative impacts. Policy needs safeguards against this.</p> <p>3. Greater recognition of the need to supply more accessible natural greenspace for affordable housing developments required.</p> <p>4. Policy lacks clear and specific criteria and terms used are open to interpretation. Ineffective for controlling development and lack clarity for decision making. A particular concern raised is lack of definition of scale of development in the Policy. Size of sites should be limited by the Policy to 25, a reasonable maximum, with larger sites allocated.</p> <p>5. To reflect national guidance, requirements for retaining affordable housing in perpetuity, other than for rural exception sites, should be removed</p>	<p>It is considered that the Policy is effective. The terminology used within policies is generally consistent with that used in national policy. The Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP4 the relevant requirements of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations .</p> <p>Settlements across Shropshire with an identified affordable housing need are diverse. It is considered that the proposed requirements of draft Policies DP3-DP7 are appropriate and balance the need to ensure affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing. Draft Policies DP4 -DP7 include a requirement to demonstrate a proven local affordable housing need and include cross-reference to a range of other relevant policies of the Plan which set out other development considerations. These include SP5 ( High Quality Design) , and, where relevant, SP10 which expects that development proposals in the countryside ‘ do not lead to an adverse cumulative impact on the character of communities’ and para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity.</p> <p>Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. Draft Policy DP4. Affordable Housing Exceptions Schemes states such schemes will be positively considered where they meet all of a series of policy requirements, including "It is served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport"</p> <p>Draft Policy DP4, identifies the primary factor that determines the size threshold for affordable housing exception sites is local need, which for most rural settlements is likely to be less than 25 dwellings. It is considered appropriate to include the general expectation of the maximum size of exception sites within the proposed explanation to draft Policy DP4. It is also considered appropriate to recognise that exceptional circumstances will exist that justify larger sites within the proposed explanation to draft Policy DP4.</p> <p>An updated Type and Affordability of Housing Supplementary Planning Document will provide an opportunity to provide definition and further context on detailed considerations.</p> <p>Requirements for affordability in perpetuity reflect significant need for affordable housing and established approaches, securing a range of affordable housing which is meeting continuing need beyond that of initial occupants. Inclusion of specific policies in the Draft Shropshire Local Plan setting out requirements for a range of affordable delivery options provides greater clarity for the development industry to bring appropriate schemes forward.</p>
<p>DP5. Entry Level Exception Sites</p>	<p>1. Policy allows developers to bring forward inappropriate sites in countryside and in other unsustainable locations with insufficient infrastructure where access to services and facilities dependent on private vehicle availability. Availability of local employment, services &amp; facilities and more extensive sustainable travel opportunities should be required.</p> <p>2. Policy allows developers to bring forward multiple sites which may have significant cumulative impacts. Policy needs safeguards against this.</p> <p>3. Greater recognition of the need to supply more accessible natural greenspace for affordable housing developments required.</p> <p>4. Policy lacks clear and specific criteria and terms used in policies are inconsistent and open to interpretation. Ineffective for controlling development and lack clarity for consistent decision making.</p>	<p>It is considered that the Policy is effective. The terminology used within policies is generally consistent with that used in national policy . The Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP5 the relevant requirements of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations . An updated Type and Affordability of Housing Supplementary Planning Document will provide an opportunity to provide definition and further context on detailed considerations</p> <p>Settlements across Shropshire with an identified affordable housing need are diverse and draft Policies DP4 - DP7 need to appropriately reflect this diversity. It is considered that the proposed requirements of draft Policies DP3-DP7 are appropriate and balance the need to ensure affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing. Draft Policies DP4 -DP7 include a requirement to demonstrate a proven local affordable housing need and include cross-reference to a range of other relevant policies of the Plan which set out other development considerations. These include SP5 ( High Quality Design) , and, where relevant, SP10 which expects that development proposals in the countryside ‘ do not lead to an adverse cumulative impact on the character of communities’ and para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity.</p> <p>Policy SP7 'Managing housing development' requires consideration be given to cumulative impacts for settlements identified in Policies S1-S20. Where development facilitated by Policy DP5 relates to a Community Hub or Community Cluster all aspects of these Policies, including the cumulative consideration of development set out in SP8 (part g) for Community Hubs &amp; SP9 (part f) for Community Clusters is relevant. Residential development outside identified settlements, in the countryside, is strictly controlled in accordance with Policy SP10 which further requires that development proposals do not lead to an adverse cumulative impact on the character of communities.</p> <p>Draft Policy DP5 states entry level schemes will be positively considered where they meet all of a series of policy requirements, including that "It is served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport" Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>DP6. Single Plot Exception Sites</p>	<ol style="list-style-type: none"> <li>1. Policy allows developers to bring forward inappropriate sites in countryside and in other unsustainable locations with insufficient infrastructure where access to services and facilities dependent on private vehicle availability. Availability of local employment, services &amp; facilities and more extensive sustainable travel opportunities should be required.</li> <li>2. Policy allows developers to bring forward multiple sites which may have cumulative impacts. Policy needs safeguards against this.</li> <li>3. Greater recognition of the need to supply more accessible natural greenspace for affordable housing developments required.</li> <li>4. Policy lacks clear and specific criteria and terms used in policies are inconsistent and open to interpretation. Ineffective for controlling development and lack clarity for consistent decision making.</li> <li>5. Policy too restrictive and should be amended to include greater flexibility to allow sites to be assessed against the spatial pattern of each individual settlement.</li> </ol>	<p>It is considered that the Policy is effective. The terminology used within policies is generally consistent with that used in national policy and there is also significant case law available to define such terms as an 'isolated dwelling'. Shropshire Council consider the criteria and requirements identified within draft Policy DP6 are appropriate and set out a clear approach to single plot exception sites. The Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP6 the relevant requirements of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations. A Housing SPD will also support housing policies and provide further guidance and clarity.</p> <p>Settlements across Shropshire with an identified affordable housing need are diverse and draft Policies DP4 - DP7 need to appropriately reflect this diversity. It is considered that the proposed requirements of draft Policies DP3-DP7 are appropriate and balance the need to ensure affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing. Draft Policies DP4 -DP7 include a requirement to demonstrate a proven local affordable housing need and include cross-reference to a range of other relevant policies of the Plan which set out other development considerations. These include SP5 (High Quality Design) and SP10 which expects that development proposals in the countryside 'do not lead to an adverse cumulative impact on the character of communities.'</p> <p>Where development facilitated by Policy DP6 relates to a Community Hub or Community Cluster all aspects of these Policies, including the cumulative consideration of development set out in SP8 (part g) for Community Hubs &amp; SP9 ( part f) for Community Clusters is relevant.</p> <p>Draft Policy DP6 states schemes will be considered where they meet all of a series of policy requirements, including that "It is served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport". Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace.</p>
<p>DP7. Cross-Subsidy Exception Schemes</p>	<ol style="list-style-type: none"> <li>1. Cross subsidy schemes not suitable for village/rural locations should be focused on larger centres.</li> <li>2. Policy allows developers to bring forward inappropriate sites in countryside and in other unsustainable locations with insufficient infrastructure where access to services and facilities dependent on private vehicle availability. Availability of local employment, services &amp; facilities and more extensive sustainable travel opportunities should be required.</li> <li>3. Policy allows developers to bring forward multiple sites which may have significant cumulative impacts. Policy needs safeguards against this.</li> <li>4. Greater recognition of the need to supply more accessible natural greenspace for affordable housing developments required.</li> <li>5. Policy lacks clear and specific criteria</li> <li>6. Unevidenced, inflexible approach not compliant with national policy. Inappropriate requirement to demonstrate exception schemes unviable. Percentage requirement for affordable element too high to secure delivery.</li> <li>7. Could prejudice delivery of 100% Affordable Exception schemes. Percentage requirements should reflect open market site affordable housing requirements.</li> <li>8. Insufficient consultation on the policy</li> </ol>	<p>Shropshire Council considers that draft Policy DP7 is consistent with the National Planning Policy Framework (NPPF) and provides beneficial supplementary local policy on Cross-Subsidy Schemes. The criteria and requirements identified within draft Policy DP7 are appropriate and set out a clear approach to cross subsidy sites. The Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP6 the relevant requirements of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations. A Housing SPD will also support housing policies and provide further guidance and clarity.</p> <p>It is considered appropriate to allow for cross-subsidy exception sites within/immediately adjoining the built form of a settlement with a school or the ability to access a school by public transport, where such proposals meet the wider requirements of draft Policy DP4, including that there is a proven local affordable housing need and it is served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport; and the wider draft Policies of the draft Shropshire Local Plan (including draft Policy DP25 regarding infrastructure provision).</p> <p>Settlements across Shropshire with an identified affordable housing need are diverse and draft Policies DP4 - DP7 need to appropriately reflect this diversity. It is considered that the proposed requirements of draft Policies DP3-DP7 are appropriate and balance the need to ensure affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing. Draft Policies DP4 -DP7 include cross-reference to a range of other relevant policies of the Plan which set out other development considerations. These include SP5 ( High Quality Design) , and, where relevant, SP10 which expects that development proposals in the countryside ' do not lead to an adverse cumulative impact on the character of communities' and para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity.</p> <p>Inclusion of specific policies in the Draft Shropshire Local Plan setting out requirements for a range of affordable delivery options provides greater clarity for the development industry to bring appropriate schemes forward.</p> <p>The cross-subsidy exception scheme draft policy is primarily intended as a delivery mechanism for affordable housing and not the provision of open market dwellings. This is reflected in the need to deliver at least 70% affordable housing tenures and directly reflect the needs outlined in a housing need survey based on tenure and size of dwellings. Requirements respond to the significant affordable housing need identified in Shropshire and reflect the expectation that affordable exception schemes are the first delivery mechanism considered.</p> <p>The proposed minimum amount of affordable housing on Cross-Subsidy Schemes is reflective and responsive to development viability which will be determined through open book appraisal at the Planning Application stage.</p> <p>A version of draft Policy DP7 was consulted upon within the Regulation 18: Pre-Submission Draft Consultation.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
DP8. Gypsy and Traveller Accommodation	<p>1. Policy requirements direct gypsy sites towards existing developed settings. Potential preference for less developed locations should be acknowledged in the draft Policy and guidance provided for both 'developed' and undeveloped locations.</p> <p>2. Unclear how the specific suitability of any site will be assessed. Policy needs to set out how the effect of a gypsy site on amenity, the environment and on existing or proposed residential, commercial and leisure facilities will be taken into consideration in planning applications.</p> <p>3. Need for both the development and the particular site must be demonstrated, in the same way rural workers dwellings must. Policy should make clear how the Council will deal with proposals for development when assessed need has been met.</p>	<p>Draft Policy DP8 reflects national policy in respect of Traveller sites, including locational and other expectations for sustainable development. National policy expects that, local planning authorities should 'very strictly limit new traveller site development in open countryside' and sets out relevant considerations.</p> <p>The draft Shropshire Local Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP8, the relevant considerations, including those relating to amenity and environment, of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations.</p> <p>GTAA evidence indicates that there is no strategic identified need and therefore no specific need for allocations. The GTAA does however recognise that some need for small sites will nevertheless arise where available supply does not meet need a specific requirement. National policy requires that where there is no identified need, criteria-based policies be included to provide a basis for decisions on any planning applications which are submitted. Draft Policy DP8 provides such a criteria-based policy. Since need must be considered on a planning application specific basis and matters such as alternative accommodation availability and the personal circumstances of applicants are relevant considerations, it would not be appropriate to impose limits on provision. The final section of the policy provides for monitoring and review.</p>
DP9. Managing and Supporting Town Centres	<p>1. Comments on where the policy should explicitly identify how it will assist in achieving net zero carbon, and that it should be revised to allow for significant progress towards achieving net zero carbon over the plan period.</p> <p>2. Comments suggesting that planned local centres should be included at proposed strategic sites within the retail hierarchy.</p>	<p>The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.</p> <p>If the Local Centres are under 300sqm then no RIA will be required. Locally the issue of protecting Town Centres is important and the current approach is consistent with how the Retail Hierarchy has been applied to Local Centres as part of SUEs.</p>
DP10. Tourism, Culture and Leisure	<p>1. Comments on where the policy should require developers to contribute to aspects such as environmental and natural asset upkeep and retention.</p> <p>2. Further detail should be provided in relation to caravans and scale and capacity.</p> <p>3. Comments on where the policy should explicitly identify how it will assist in achieving net zero carbon, and that it should be revised to allow for significant progress towards achieving net zero carbon over the plan period</p> <p>4. Wording in the policy should mirror the guidance in the NPPF with the encouragement to engage with appropriate bodies.</p> <p>5. Some of the detail is too restrictive in relation to holiday accommodation.</p>	<p>These types of aspects are covered under DP10 1c and 1f, as well as other relevant policies that an application would have to comply with.</p> <p>This would be relevant on a case-by-case basis, as there may be sites of much larger caravans or log cabins etc and others with smaller ones, or sites with numerous caravans or log cabins and other sites with very few. Therefore, such a matter would be dealt with at the planning application stage.</p> <p>The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.</p> <p>Aspects which are already expressed in the NPPF are unnecessary to be repeated in the Local Plan (i.e. para 40 in this case).</p> <p>Shropshire Council considers that the existing wording is appropriate as the tourism enterprise should be established and viable rather than just one of those two. To revised to "and/or" (or equivalent) here may result in unviable tourism which will ultimately lead to a backdoor entrance for inappropriate residential dwellings in the countryside.</p>



Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>DP11. Minimising Carbon Emissions</p>	<p>1. The policy needs does not go far enough and should be strengthened                  2. The policy is not compliant with national planning policy or guidance and its requirements cannot be justified.                  3. The requirements of the policy would make development unviable</p>	<p>1. The Council considers that this policy introduces effective and appropriate policy requirements for new development to contribute to reducing impact on climate change, whilst also ensuring compliance with national policy and legislation                  2. Subsection 1 (a) of the 2008 Planning and Energy Act states that Local Planning Authorities may include policies imposing reasonable requirements for ‘a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development’, provided these are consistent with national policy. National policy is the 2015 Written Ministerial Statement which allows Local Planning Authorities to set Code for Sustainable Homes level 4 energy standards. The policy reflects this standard.                  Although the government announced its intention to amend Subsection 1 (c) of the 2008 Planning and Energy Act in 2015 - which states that Local Planning Authorities may include policies imposing reasonable requirements for ‘development in their area to comply with energy efficiency standards that exceed the energy requirements of the building regulations’ - these amendments have not yet been enacted. The intention of the amendment was to introduce higher energy performance requirements through building regulations, rather than the planning system. The performance increase was expected to be a 19% improvement. This improvement is also referenced in national policy through the 2015 Written Ministerial Statement - being equivalent to the Code for Sustainable Homes level 4 energy criteria which the Statement permits. However, the government’s 2015 Productivity Plan subsequently stated that ‘the government does not intend to proceed with .....the proposed increase in on-site energy efficiency standards, but will keep energy efficiency standards under review recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.’ Recent government consultations on the Future Homes Standard and Future Buildings Standard indicate that such a review is ongoing with the outcome forming part of changes to Part L of the Building Regulations. However, these changes have not yet been made. Thus, the Council believes that the powers afforded to LPAs through the 2008 Planning and Energy Act to set energy efficiency standards in new homes still exist and that this policy’s requirements are appropriate. Provision is also made in the policy for higher Building Regulations standards to apply if/when these are implemented.                  3. Whole Plan Viability Assessment has been undertaken to inform policy requirements with the intention of ensuring the viability and deliverability of the draft Shropshire Local Plan. Draft Policy DP11 has been subject to due consideration within this assessment.                  Subsection 1 (a) of the 2008 Planning and Energy Act states that Local Planning Authorities may include policies imposing reasonable requirements for ‘a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development’, provided these are consistent with national policy. National policy is the 2015 Written Ministerial Statement which allows Local Planning Authorities to set Code for Sustainable Homes level 4 energy standards. The policy reflects this standard.                  Although the government announced its intention to amend Subsection 1 (c) of the 2008 Planning and Energy Act in 2015 - which states that Local Planning Authorities may include policies imposing reasonable requirements for ‘development in their area to comply with energy efficiency standards that exceed the energy requirements of the building regulations’ - these amendments have not yet been enacted. The intention of the amendment was to introduce higher energy performance requirements through building regulations, rather than the planning system. The performance increase was expected to be a 19% improvement. This improvement is also referenced in national policy through the 2015 Written Ministerial Statement - being equivalent to the Code for Sustainable Homes level 4 energy criteria which the Statement permits. However, the government’s 2015 Productivity Plan subsequently stated that ‘the government does not intend to proceed with .....the proposed increase in on-site energy efficiency standards, but will keep energy efficiency standards under review recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.’ Recent government consultations on the Future Homes Standard and Future Buildings Standard indicate that such a review is ongoing with the outcome forming part of changes to Part L of the Building Regulations. However, these changes have not yet been made. Thus, the Council believes that the powers afforded to LPAs through the 2008 Planning and Energy Act to set energy efficiency standards in new homes still exist and that this policy’s requirements are appropriate. Provision is also made in the policy for higher Building Regulations standards to apply if/when these are implemented.                  Whole Plan Viability Assessment has been undertaken to inform policy requirements with the intention of ensuring the viability and deliverability of the draft Shropshire Local Plan. Draft Policy DP11 has been subject to due consideration within this assessment. No change proposed.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
DP12. The Natural Environment	<ol style="list-style-type: none"> <li>1. The level of biodiversity net gain should be higher than 10%.</li> <li>2. Additional natural assets should be protected, or other strategies should be referred to within the policy or its explanation.</li> <li>3. The policy should not require biodiversity net gain as although this is a provision of the Environment Bill, that bill has not yet been carried forward into law.</li> <li>4. The policy's requirements would make development unviable.</li> </ol>	<ol style="list-style-type: none"> <li>1. The requirement for a 10% net gain for biodiversity reflects the provisions of the Environment Bill and the Council thus considers it to be appropriate</li> <li>2. The Council considers that the requirements of the policy are consistent with national planning policy and guidance and that none of the proposed amendments are necessary.</li> <li>3. The Queens Speech of 11th May 2021 indicated Government's intention to introduce the Environment Bill in the upcoming Parliamentary year. The key element of the Environment Bill is at least 10% biodiversity net gain. The Council is confident that this will be carried forward into law and that it is appropriate to include it in Policy DP12 to give clarity to developers, communities, and the decision maker on requirements.</li> <li>4. A Whole Plan Viability Assessment has been undertaken to inform policy requirements with the intention of ensuring the viability and deliverability of the draft Shropshire Local Plan. Draft Policy DP12 has been subject to due consideration within this assessment.</li> </ol>
DP13. Development in the River Clun Catchment	<ol style="list-style-type: none"> <li>1. Objections on the legal compliance and deliverability of the policy have been received from the Environment Agency and Natural England.</li> <li>2. Current Council guidance on development within the River Clun Catchment references the production of a revised nutrient management plan as the key to unlocking development. This should be produced as soon as possible.</li> </ol>	<ol style="list-style-type: none"> <li>1. A series of minor modifications to address the objections from the Environment Agency and Natural England are set out in the respective Statements of Common Ground and are included in the Schedule of Minor Modifications.</li> <li>2. The Council has proposed minor modifications to Policy DP13 in response to comments received from the Environment Agency and Natural England. These modifications address the production of a River Clun SAC Restoration Plan.</li> </ol>
DP14. Green Infrastructure	<ol style="list-style-type: none"> <li>1. Green Infrastructure should be mapped for Hubs and Clusters</li> <li>2. Sport England sought clarification that the policy was not intended to cover playing fields.</li> <li>3. Various amendments were suggested to: require GI to be maintained for the lifetime of the development; provide additional detail on when GI assessments would be required and to recognise that both quantity and quality of GI are important.</li> <li>4. There was a good level of support for the policy</li> </ol>	<ol style="list-style-type: none"> <li>1. The Council considers the approach taken to the mapping of Green Infrastructure is proportionate and appropriate and does not preclude work being carried out in the future for Community Hubs and Community Clusters.</li> <li>2. A minor modification to paragraph 4.138 to clarify that playing fields are covered by Policy DP15 is proposed</li> <li>3. The Council considers that the policy and explanation provide an appropriate level of detail, are proportionate and are consistent with national planning policy and guidance.</li> <li>4. The support is welcomed.</li> </ol>
DP15. Open Space and Recreation	<ol style="list-style-type: none"> <li>1. A 'design-led' approach to the amount of open space provided would be better than a prescribed standard.</li> <li>2. The standard of 30m2 open space per person is not supported by an evidence base.</li> </ol>	<ol style="list-style-type: none"> <li>1. Draft Policy DP15 is also considered to provide appropriate flexibility in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents.</li> <li>2. The Shropshire Open Space Needs Assessment (2018) undertaken to inform the draft Shropshire Local Plan identifies the need for 30sq.m per person, which is reflected within draft Policy DP15. This requirement is also consistent with the adopted Local Plan.</li> </ol>
DP16. Landscaping of New Development	No key issues were raised.	N/A
DP17. Landscape and Visual Amenity	<ol style="list-style-type: none"> <li>1. Policy DP17 has not been correctly applied in the site selection process.</li> </ol>	Policy DP17 requires development proposals to assess their impact on landscape and visual amenity and will apply to all planning applications on allocated sites. The principles behind policy DP17 have been applied through the Sustainability Appraisal and Site Assessment process which considered the landscape and visual sensitivity of all SHLAA sites based on the Council's Landscape and Visual Sensitivity Study.
DP18. Pollution and Public Amenity	<ol style="list-style-type: none"> <li>1. Biodiversity features should be protected by this policy.</li> <li>2. The Ministry of Defence was concerned that noise sensitive developments close to areas where defence activities create noise could lead to complaints.</li> <li>3. General support for the policy</li> </ol>	<ol style="list-style-type: none"> <li>1. Other policies in the plan protect biodiversity</li> <li>2. A series of minor amendments are proposed to the policy and explanation to clarify the need for development proposals to take military activities into account.</li> <li>3. The support is welcomed</li> </ol>
DP19. Water Resources and Water Quality	<ol style="list-style-type: none"> <li>1. Assurances should be sought from the appropriate utilities that the infrastructure will be sufficient to support any developments</li> <li>2. The protection for groundwater Source Protection Zones should be strengthened</li> <li>3. A series of textual and technical amendments were suggested by the Environment Agency to clarify legal requirements and conserve and enhance water quality.</li> <li>4. The Policy should contain an explicit link to achieving net zero carbon.</li> </ol>	<ol style="list-style-type: none"> <li>1. The Council's Statements of Common Ground with Severn Trent Water and Dwr Cymru Welsh Water show that the water infrastructure requirements identified in the Councils Water Cycle Study can be delivered.</li> <li>2. The Council considers that the Policy provides appropriate and adequate protection for groundwater Source Protection Zones. No changes are proposed.</li> <li>3. Minor modifications are proposed to the wording of the policy relating to the Water Framework Directive and to clarify requirements to protect private potable water supplies. The other suggested amendments have not been accepted because the Council considers that they would either duplicate existing regulatory regimes or are not reasonable/not necessary.</li> <li>4. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.</li> </ol>
DP20. Water Efficiency	<ol style="list-style-type: none"> <li>1. The requirement for the higher water efficiency standard is unsound because it is unjustified and inconsistent with national policy.</li> </ol>	The government has introduced an optional new Building Regulation standard that can be required through a Local Plan policy if it addresses a clearly evidenced need and its impact on viability has been considered. The Shropshire Water Cycle Study provides the evidence for a standard of 110 litres per day per person and this has been assessed through the Shropshire Viability Study. No change proposed.

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
DP21. Flood Risk	<ol style="list-style-type: none"> <li>The sequential and exception tests for the proposed site allocations do not correctly identify all flood related issues.</li> <li>An amendment to paragraph 2a of the policy so that it makes sense is suggested.</li> </ol>	<ol style="list-style-type: none"> <li>The application of the Sequential and Exception Tests to all proposed site allocations is based on the information contained in the Council's Strategic Flood Risk Assessments (Levels 1 and 2) and follows national planning policy and guidance. As such the Council considers it is accurate and appropriate.</li> <li>A minor modification is proposed to include text omitted in error.</li> </ol>
DP22. Sustainable Drainage Systems	<ol style="list-style-type: none"> <li>Clarity should be provided by reference to the specific part of the Lead Local Flood Authorities guidance on the allowance for urban creep.</li> <li>The Environment Agency suggested amendments to include technical details of when SuDS would be acceptable with reference to groundwater levels, clarification of text on climate change allowances and reference to other guidance documents.</li> </ol>	<p>The Council considers it appropriate to reference LLFA guidance rather than a specific part of it a document as this allows updates to the guidance to be made during the lifetime of the Local Plan which keep it current.</p> <p>A minor modifications are proposed to clarify the text on climate change allowances, but the Council does not feel it would be appropriate to include more technical information in the policy or to reference additional guidance as the documents currently referenced in the policy cover these issues</p>
DP23. Conserving and Enhancing the Historic Environment	<ol style="list-style-type: none"> <li>The policy should seek to encourage and enable the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings whilst safeguarding the special characteristics of these heritage assets for the future.</li> <li>The policy does not align with NPPF.</li> </ol>	<ol style="list-style-type: none"> <li>Proposals for the retrofitting of energy efficiency measures and for the installation of renewable energy systems on or affecting heritage assets would be assessed against this policy as and when they come forward. The Council does not consider it necessary to encourage such proposals and as such does not propose any changes to the policy.</li> <li>The Council considers that the requirements of this policy are consistent with national planning policy and guidance.</li> </ol>
DP24. Shropshire Hills Area of Outstanding Natural Beauty	<ol style="list-style-type: none"> <li>The Council should prepare a separate DPD for the AONB.</li> <li>The definition of 'major development' should be amended to allow smaller scale proposals to be included.</li> <li>The policy should refer to the 'setting' of the AONB.</li> </ol>	<ol style="list-style-type: none"> <li>The Council considers that the Shropshire Local Plan is the most appropriate mechanism for safeguarding the Shropshire Hills AONB and does not propose to prepare a separate DPD.</li> <li>The Council considers it appropriate to use the definition of major development set out in the NPPF. This provides certainty and consistency for developers on the Council's approach to development in the AONB.</li> <li>The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that the policy thus makes appropriate provision for the effect of development outside the AONB on the designated area.</li> </ol>
DP25. Infrastructure Provision	<ol style="list-style-type: none"> <li>The Infrastructure policy should improve the provision of public transport, walking and cycling.</li> <li>Shifnal's infrastructure needs should be met and provided for in advance of development.</li> <li>West Mercia Police requested that emergency services infrastructure be included in the explanation to the Policy.</li> <li>Concern was expressed that developer contributions to NHS Trusts' critical infrastructure requirements have not been considered and that the Council has not engaged with the Clinical Commissioning Group to ensure that the development impacts have been considered for cross-boundary services.</li> </ol>	<ol style="list-style-type: none"> <li>Local and strategic highway improvements may of course include infrastructure associated with walking, cycling and public transport. The prioritisation of infrastructure is undertaken through the Strategic Infrastructure Implementation Plan and Place Plan process.</li> <li>The infrastructure needs of Shifnal will be taken into account through the Strategic Infrastructure Implementation Plan and Place Plan process.</li> <li>A minor modification is proposed to para 4.224 of the explanation for draft Policy DP25 to include reference to emergency services infrastructure.</li> <li>Draft Policy DP25 specifies that "For new development where the Community Infrastructure Levy (CIL) applies, priority will be given to using CIL funds to support any critical or statutory infrastructure requirements resulting from the development." The explanation to draft Policy DP25 specifically includes reference to health care infrastructure as a form of critical infrastructure. Furthermore, draft Policy DP25 states that "On proposals where it is considered CIL funds will not be sufficient to meet the specific infrastructure needs of development, consideration will be given to applying additional Section 106 contributions for specific infrastructure items where this meets national requirements for planning obligations." Additionally, Shropshire Council welcomes positive engagement with the NHS Trusts and would encourage them to join the strategic infrastructure forum established for Shropshire. We would also encourage engagement in the Place Plan process to identify critical statutory healthcare infrastructure requirements alongside all potential funding mechanisms (including national funding) available.</li> </ol> <p>Additionally, Shropshire Council has engaged with strategic infrastructure providers, including the Clinical Commissioning Group, through the Place Plan process (the Place Plans have informed the Strategic Infrastructure Implementation Plan and together these documents for part of the evidence base for the draft Shropshire Local Plan).</p>
DP26. Strategic, Renewable and Low Carbon Infrastructure	<ol style="list-style-type: none"> <li>The Environment Agency requested that additional assessments be required for hydropower and biomass proposals</li> <li>The policy does not go far enough to provide for the scale of renewable energy needed for decarbonisation and seems designed to prevent renewable energy proposals being permitted.</li> <li>The policy does not provide sufficient guidance to protect the special qualities of the Shropshire Hills AONB.</li> </ol>	<ol style="list-style-type: none"> <li>Minor modifications are proposed to accommodate some of the issues raised by the Environment Agency.</li> <li>The Council considers that the requirements of this policy are consistent with national planning policy and guidance.</li> <li>Any development proposals for renewable energy will be assessed against policy DP24 The Shropshire Hills AONB. The Council considers that the latter provides sufficient clarity and guidance on the protection of the special qualities of the designated area. No change proposed.</li> </ol>



Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>DP27. Broadband and Mobile Communications Infrastructure</p>	<p>1. Respondents to the Local Plan welcome the move towards more sustainable practices to reduce the need to travel.                      2. Respondents to the Local Plan wish to see an explicit link in Policy DP27 to the ways in which the Local Plan will assist in achieving a net zero carbon economy and lifestyles.                      3. Respondents welcome the aspirations to improve Broadband capacity in Shropshire but object to part 3 of draft Policy DP27 which hard for developers to deliver. Requirements have to be delivered by infrastructure providers. Therefore, Policy DP27 should not impose new electronic communications requirements beyond those set out in statutory Building Regulations.                      4. Respondents to the Local Plan object to part 5 criterion (a) through to criterion (d) of the draft Policy DP27 which places an onerous requirement on residential and commercial developers to provide and maintain communications networks which is the responsibility of communications infrastructure companies.</p>	<p>Shropshire Council welcomes the support for Policy DP27 as evidence of the soundness of the Draft Local Plan. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. This is especially promoted through Policy DP27 and the key objectives of the policy to deliver high quality, digital infrastructure that meets the needs of businesses and communities as an essential utility to support their quality of life, to facilitate social inclusion and reduce the need to travel to access work, services and leisure opportunities particularly to support how they choose to work, live and seek to lower the 'carbon footprint' of their business operation or lifestyle. Shropshire Council is working to improve broadband connectivity across the County through its Connecting Shropshire programme to attract commercial superfast broadband infrastructure investment and to bring faster broadband to areas where it is not economically viable for commercial operators to provide these services. The purpose of these objectives for connecting Shropshire to the best electronic communications infrastructure into their business premises and homes is to ensure businesses, employees and residents can embrace and optimise the use of broadband in their everyday lives. Unless the development market also embraces these objectives in their development design schemes and build specifications through the provision of network infrastructure and fibre to premises technologies then the roll out of digital connectivity will not be achieved and Shropshire will struggle in its programme to move towards and achieve the broader objective to achieve a zero carbon economy in the County.</p>
<p>DP28. Communications and Transport</p>	<p>1. Respondents to the Local Plan welcome the positive response to the climate problems, but feel the focus on unsustainable transport should be reconsidered. For example, DP28(3d, e and g) still promotes road and other unsuitable transport links, i.e. HS2 and the focus on these unsustainable modes of transport should be reduced in the Plan.                      2. Respondents to the Local Plan consider that the explicit support for the NWRR in Policy DP28(3)(e) and the Explanation at paragraph 4.257 should be removed from the Plan as this is considered to compromise any attempt at sustainability or to address the climate or ecological emergency.                      3. Respondents to the Local Plan consider that the canal network between Shrewsbury, Uffington, Upton Magna and Withington should be restored and Policy DP28(3)(b) and the Explanation at paragraph 4.253 should be amended to include the objective "To undertake the complete restoration of the Shrewsbury Canal to its original terminus at the Butter Market."</p>	<p>Policy DP28 recognises that a sustainable transportation system for Shropshire must include a range of transport networks and services and present a range of travel options to individuals, households, organisations, and businesses. Policy DP28 constructs the transportation system into a hierarchy to promote sustainable choices by informing and encouraging those travelling or transporting goods to choose sustainable transport options to meet their needs. Although this hierarchy includes modes of transport considered to be unsustainable, these options are still part of the transportation system and may be the best or only means by which to travel or transport goods over long distances or to access less well-connected places. Policy DP28 also recognises the need for more sustainable choices in looking towards the delivery of new travel and transport options, in advocating the Hierarchy of Sustainable Transport as a simple decision pathway for everyone to follow in making their choices about travel and transport and by encouraging everyone to consider how they can contribute to reversing adverse changes to our environment. Shropshire Council has set out in Policy DP28 the summary explanation for the North West Relief Road from the Outline Business Case for the construction of this new road. The primary purpose of the road is to link the urban highway network in both the north and the west of the town together to remove the need for local and through traffic to circumnavigate the east, south and west quadrants of the town or to travel through the town centre as opposed to simply traversing the north-west quadrant of the town. This strategic infrastructure proposal has been included in Policy DP28 to recognise a fundamental principal of the Hierarchy of Sustainable Transport which is the continuing need for private motor transport particularly with the national programme to move to vehicles with electronic power cells and other non-fossil fuel energy sources. This continuing need for private transport brings with it a need for essential improvements or new construction on the highway networks to support its use in order to properly serve the needs of the economy and the communities in Shropshire, the West Midlands and England. Shropshire Council considers that the principles and objectives of the Hierarchy of Sustainable Transport and the NWRR are mutually inclusive and contribute to the strengths and opportunities provided by a broad based, balanced, and ambitious Local Plan. The Council considers that these two principles and objectives for the Hierarchy of Sustainable Transport and the provision of the NWRR are consistent with the strategy of the Local Plan. The policy framework is also internally consistent with the inclusion of the NWRR in Policy DP28 when the plan is read as a whole.</p>
<p>DP29. Mineral Safeguarding</p>	<p>1. None of the exemptions to the requirements to assess sterilising of mineral resources within Mineral Safeguarding Areas apply to proposals on site allocations.</p>	<p>Paragraph 4.264 of the Explanation of draft Policy DP29 states 4. Non-mineral development which is exempt from the requirements of this Policy comprises: "...Applications that are in accordance with the development plan and site allocations where the assessment of site options took account of potential mineral sterilisation and determined that prior extraction was not required". The assessment process for all proposed saved SAMDev Plan allocations and all proposed allocations within the draft Shropshire Local Plan took account of potential mineral sterilisation and determined that prior extraction was not required (unless otherwise specified). As such they are included within the specified list of exemptions (unless otherwise specified).</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
DP30. Sites for Sand and Gravel Working	<ol style="list-style-type: none"> <li>1. Draft Policy DP30 provides a spatial strategy for provision of sand and gravel which should be included in draft Policy SP16.</li> <li>2. There are inconsistencies between permitted reserves specified within Table DP30.1 of the proposed explanation to draft Policy DP30 (13.5Mt) and the Minerals Technical Background Paper (10.93Mt).</li> <li>3. The windfall allowance to maintain an adequate and steady supply of sand and gravel is high. It is also unclear whether windfall sites would accord with the draft Shropshire Local Plan.</li> <li>4. Minerals arising in Shropshire are used beyond the Local Authority area.</li> <li>5. Similar information to that available for sand and gravel should be provided for other mineral resources.</li> <li>6. Figure SP16.1 is incorrectly referenced within this draft Policy.</li> </ol>	<p>Shropshire Council considers that the draft Mineral Policies provide an effective framework for ensuring a sufficient supply of minerals and to manage mineral development proposals.</p> <p>Draft Policies SP16 and DP30 are intended to be complementary. As such a minor modification is proposed to para 4 of draft Policy SP16 to clarify this.</p> <p>13.5mt specified in Table DP30.1 of the explanation to draft Policy DP30 is correct and based on returns to AM2018. Draft returns for AM2019 suggest an improvement on the previous year's reserves and production performance. Whilst it is acknowledged that the windfall allowance is high, it is based on the planned extension of existing sites (which accord with the existing and draft Local Plan), with the exception of a single site which is subject to a current planning application (recommended for approval).</p> <p>For clarity a minor modification is proposed to the proposed explanation of draft Policy SP16 to provide further information in relation to crushed rock and cross-reference the Minerals Technical Background report. A minor modification is proposed to correct references to Figures DP16.1.</p>
DP31. Managing Development and Operation of Mineral Sites	<ol style="list-style-type: none"> <li>1. Minerals arising in Shropshire are used beyond the Local Authority area.</li> <li>2. There is no justification for winning and working coal.</li> <li>3. Concerns about impact of mineral working on the water environment.</li> <li>4. Site restoration should follow principles of Biodiversity Net Gain and consider opportunities for habitat creation and flood water storage.</li> <li>5. To protect defence interests, the need to mitigate bird hazard should extend throughout development/operation of a mineral site.</li> </ol>	<p>Shropshire Council considers that the draft Mineral Policies provide an effective framework for ensuring a sufficient supply of minerals and to manage mineral development proposals.</p> <p>Any Planning Application for the winning and working of coal will be determined in accordance with the NPPF. Para 4 of draft Policy DP31 establishes a policy requirement for any such application to also include proposals for the separation and stockpiling of fireclay so that its value as a mineral resource can be captured.</p> <p>Para 4.274 of the proposed explanation to draft Policy DP31 recognises that restoration and aftercare of mineral sites provides positive opportunities to deliver environmental or community benefits. It also recognises that we therefore need to establish policies to support mineral working which helps to secure locally sensitive design and to ensure that high quality restoration and aftercare of mineral sites takes place at the earliest opportunity and, wherever possible, helps to secure green infrastructure or environmental and community benefits identified in the relevant local Place Plan. Draft Policy DP12 addresses biodiversity net gain, it includes "Ensuring that all development delivers at least a 10% net gain for biodiversity in accordance with the Environment Act, any future Local Nature Recovery Strategy (LNRS) and policies DP14, DP15, DP16 and DP22." Site-specific proposals/opportunities are most appropriately addressed as part of the Planning Application process.</p> <p>Protection of the water environment is addressed within para 4.272 of the explanation to draft Policy DP31. It recognises that mineral working must not have an unacceptable adverse impact on the natural and historic environment or human health. It also includes specific requirements with regard to the water environment including the need for early consideration, a hydro-geological risk assessment, groundwater level monitoring well in advance of any Planning Application, a water features survey and long-term monitoring programme for the water environment.</p> <p>For the sake of clarity a minor modification is proposed to ensure consideration of bird hazard as part of mineral working and subsequent site restoration.</p>
DP32. Waste Management Facilities	<ol style="list-style-type: none"> <li>1. Waste facilities in Shropshire provide for waste arising outside of the Local Authority area.</li> <li>2. Require all potential adverse impacts of waste management facilities to be avoided.</li> <li>3. The impact of odour, dust and bio-aerosols associated with waste management facilities should be considered.</li> <li>4. Where both a Planning Application and Environmental Permit Application for waste management facilities are required, twin-tracking should be encouraged.</li> </ol>	<p>Shropshire Council considers that the draft Waste Policies provide an effective framework for ensuring sufficient capacity within waste management facilities and for managing waste management development proposals.</p> <p>A requirement for all potential adverse impacts of waste management facilities is unrealistic and would be inconsistent with national policy for waste and would impose an unreasonable constraint on this type of essential business and community infrastructure in circumstances where impacts can be satisfactorily controlled, as is required by the draft Policy.</p> <p>It is acknowledged that the impact of odour, dust and bio-aerosols associated with waste management facilities should be considered and as such an appropriate minor modification is proposed for the purpose of clarity.</p> <p>It is also acknowledged that, where both are required, promoting opportunities for twin-tracking of an Environmental Permit Application and Planning Application for a site would provide a greater degree of certainty to the applicant, although this is not a policy consideration. As such an appropriate minor modification is proposed to the explanation of draft Policy DP32.</p>
DP33. Landfill and Landraising Sites	<ol style="list-style-type: none"> <li>1. Waste facilities in Shropshire provide for waste arising outside of the Local Authority area.</li> <li>2. Landfill/landraising sites should not be located in Source Protection Zones.</li> <li>3. Sites below the water table in sensitive groundwater settings should be refused.</li> <li>4. The draft Policy should recommend parallel tracking of any Landfill Permit Application (with associated hydrogeological risk assessment) and the Planning Application.</li> </ol>	<p>Shropshire Council considers that the draft Waste Policies provide an effective framework for ensuring sufficient capacity within waste management facilities and for managing waste management development proposals.</p> <p>It is considered that para 2a of draft Policy DP33 provides appropriate reference to the need for compliance with water management and water resource protection policy requirements. Furthermore, the draft Shropshire Local Plan should be read as a whole and draft Policy DP19 specifically addresses water resources and water quality. However, for clarity a minor modification is proposed to cross reference draft Policy DP19 within para 2a of draft Policy DP33.</p> <p>The need to consider opportunities for parallel tracking is recognised. As such a minor modification is proposed to para 4.280 of the explanation to draft Policy DP32.</p>



Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S1. Albrighton Place Plan Area	See S1.1	See S1.1
S1.1. Development Strategy: Albrighton Key Centre	<p>1. The level of development proposed for Albrighton within the proposed development strategy is insufficient - suggestions it fails to respond to the proposed strategic approach in draft Policy SP2; Albrighton's strategic location on the M54 strategic corridor and relationship to RAF Cosford; Albrighton's sustainability and housing need/characteristics; and unmet cross-boundary need arising in the Black Country.</p> <p>2. Deliverability of existing allocations and proposed windfall allowances queried.</p> <p>3. Objection to proposed allocations and the site assessment/Sustainability Appraisal undertaken to identify them.</p> <p>4. Objection to the proposed development boundary for Albrighton, which is considered too restrictive (and excludes various referenced sites).</p> <p>5. Objection to proposed safeguarded land/amount of proposed safeguarded land - suggestions parts are not suitable/available and/or more is required.</p> <p>6. Additional/alternative site allocations and/or safeguarded land proposed - suggestions these are more suitable and sustainable than those proposed.</p> <p>7. The robustness and conclusions of the Green Belt Assessment and Green Belt Review undertaken to inform the draft Shropshire Local Plan is queried.</p> <p>8. Representations on Proposed site guidelines, including:</p> <p>a. Concern about proposed links into saved SAMDev Plan Allocation ALB002.</p> <p>b. Concern about proposed requirement for roundabout access.</p> <p>c. Support for proposed requirement for comprehensive masterplanning and access from ALB017 into ALB021.</p> <p>d. Concern regarding proposed need to consider on-site public car parking.</p> <p>e. Concern regarding proposed green infrastructure buffer of the railway line and associated green infrastructure corridor.</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Albrighton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Furthermore, proposed allocations and proposed safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, informed by a proportionate and robust Green Belt Review.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Shropshire Council also considers the proposed development boundary for the settlement to be appropriate and reflects the extent of Green Belt and built form.</p> <p>Shropshire Council considers that the proposed site guidelines for ALB017 are appropriate and sound:</p> <p>-Concerns regarding proposed links into saved SAMDev Plan allocation ALB002 are noted. However, to ensure access to services and facilities in the town and integrated communities are achieved, these links are considered essential. To recognise the approved design and layout of the southern element of SAMDev Plan allocation ALB002, a minor modification is proposed.</p> <p>-Shropshire Council continues to believe a roundabout remains the most appropriate means of access to ALB017/ALB021 and initial highway comments on the pre-application referenced in this representation are not considered to contradict this position. Indeed, they note that "any future planning application should provide any and all details necessary to assist with the appropriate determination from a Highways and Transport perspective. This should include vehicular and pedestrian/cycle access and junction details with associated visibility splays, sustainable travel facilities, Transport Assessment and Travel Plans." It is also noted that this access point will also serve ALB021 and will connect to essential linkages through to the adjoining saved allocation ALB002.</p> <p>-It is considered appropriate to include a guideline regarding consideration of the potential to provide on-site public car-parking, as it is noted that this is a matter of significant local interest.</p> <p>-It is considered appropriate to require a green infrastructure buffer along the railway line/green infrastructure corridor, as such provision responds to ecology comments that this corridor forms an environmental network and as such should be buffered. It is also considered that such provision, alongside the wider design and layout of the development, will effectively respond to any issues of noise associated with the railway line, an issue raised within the public protection assessment of the site.</p>
S1.2. Community Hubs: Albrighton Place Plan Area	N/A	N/A
S1.3. Community Clusters: Albrighton Place Plan Area	N/A	N/A
S1.4. Wider Rural Area: Albrighton Place Plan Area	N/A	N/A
S2. Bishop's Castle Place Plan Area	See S2.1-S2.4	See S2.1-S2.4
S2.1. Development Strategy: Bishop's Castle Key Centre	N/A	N/A

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S2.2. Community Hubs: Bishop's Castle Place Plan Area	<p>1. Respondents to the Local Plan requested a reduction of the proposed residential guideline (110 dwellings) for Bucknell.</p> <p>2. Respondents to the Local Plan requested either the removal of proposed allocation BKL008a and all references to it or the provision of a binding statement that BKL008a will not be designated as a housing until 2035-2038.</p> <p>3. Respondents to the Local Plan requested that brownfield site BUCK001, which is the saved SAMDev housing allocation, be extended to deliver additional housing in Bucknell to 2038 and the delivery of this site be regarded as a priority objective for the implementation of the draft Shropshire Local Plan.</p> <p>4. Respondents to the Local Plan requested the plan be modified to include specific, positive, measures that will: ensure the longevity of the freshwater pearl colony, and ii. Ensure that the development that is assessed as being necessary in the River Clun catchment can be delivered immediately upon the adoption of the draft Shropshire Local Plan.</p> <p>5. Respondents to the Local Plan requested amendments to the policy statement for Bucknell to clarify the support for site BUCK001, the significance of the rail services through the village, the enclosure of the north of the village in the AONB and the significance of the orientation of proposed allocation BKL008a to the AONB and Conservation Area.</p> <p>6. Respondents to the Local Plan support the recognition of the significance of the heritage assets in Clun and the requirement in the development guidelines to site CLU005 for a heritage assessment to conform with national and local heritage policies.</p> <p>7. Respondents to the Local Plan support the allocation of site CLU005 which extends saved allocation CLUN002. The combined capacity of 85 dwellings makes a significant contribution to the Clun housing guideline of 95 dwellings and they provide a viable and deliverable housing development opportunity for the town.</p> <p>8. Respondents were concerned that the proposed site allocations in Worthen had not correctly assessed the impact on highways, the Shropshire Hills AONB (Note: Worthen is not in the AONB) and on flood risk.</p> <p>9. Respondents requested that Worthen and Brockton be returned to Countryside and not designated as a Community Hub.</p> <p>10. Respondents were concerned that such a significant change to the community of Worthen had not been properly assessed and was thus not in accordance with the NPPF.</p>	<p>1. Bucknell is appropriately designated as a Community Hub on the size of the settlement and the services and facilities it provides. Shropshire Council considers that the proposed development strategy for Bucknell and the existing and proposed allocations which contribute towards achieving this proposed development strategy are appropriate, effective, sustainable, and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>2. Proposed site allocations have been informed by a proportionate and robust site assessment process. The settlement strategy for Bucknell, which is clearly explained in the Draft Local Plan, was consistently presented in consultations during its preparation. New housing allocation BKL008a for 20 dwellings was identified in the Preferred Sites consultation in 2018 and presented in subsequent consultations. Site BKL008a will supplement the saved SAMDev brownfield housing and employment allocation at BUCK001/BKL011 which already forms part of the housing land supply in Bucknell.</p> <p>3 and 5. The Council considered local representations recommending a further extension to BUCK001 but this site was extended to 70 dwellings in the SAMDev Plan and a further extension may affect its viability in the village of Bucknell. Further site options in Bucknell are influenced by the Area of Outstanding Natural Beauty and the Bucknell Conservation Area that cover the centre and west of the village. Site BKL008a on the east of the village lies beyond these two protective designations and provides an appropriate location for further modest housing development to meet a revised housing requirement for 110 dwellings which represents a modest increase from the previous figure of 100 dwellings.</p> <p>4. The delivery of BUCK001 and BKL008a is currently affected by the protection of the River Clun Special Area of Conservation (SAC) due to the water quality in the river. Site BKL008a could be delivered quickly as a smaller, greenfield allocation to refresh the housing market when the issues connected with the protection of the SAC are resolved but currently these issues will defer the delivery of new housing in Bucknell.</p> <p>6 and 7. The settlement strategy for Clun is supported and recognises that the town is appropriately designated as a Community Hub and has identified a suitable housing allocation on site CLU005 to extend the current, saved housing allocation on site CLUN002.</p> <p>8. All the proposed site allocations in Worthen have been informed by a proportionate and robust site assessment process, which included considerations of highways impact, effect on the Shropshire Hills AONB and flood risk.</p> <p>9. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Worthen and Brockton. Consequently, it is considered appropriate that Worthen and Brockton are identified as a proposed Community Hub.</p> <p>10. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is compliant with the NPPF, appropriate, effective, sustainable, and deliverable.</p>
S2.3. Community Clusters: Bishop's Castle Place Plan Area	N/A	N/A
S2.4. Wider Rural Area: Bishop's Castle Place Plan Area	N/A	N/A
S3. Bridgnorth Place Plan Area	See S3.1-S3.4	See S3.1-S3.4

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S3.1. Development Strategy: Bridgnorth Principal Centre</p>	<p>1. The proposed housing and employment guidelines are not based on robust evidence and/or disregard responses to previous stages of consultation.</p> <p>2. Objections to the level of residential and/or employment development proposed for Bridgnorth. Reasoning for objections varied, but included: lack of need/demand (some representations also suggested the need for settlement specific assessments of local housing need); level of increase above the existing population; level of increase above past delivery rates; existing available land; market capacity/interest; infrastructure capacity (particularly highways); and conflict with conclusions reached within the Bridgnorth Plan.</p> <p>3. Suggestions development should be directed to other settlements (Telford often referenced).</p> <p>4. Concerns that the level of employment land proposed is unclear.</p> <p>5. Objections to proposed mixed-use allocation BRD030. Reasoning for objections varied, but included such factors as: alternative sites (BRD032 often referenced) more appropriate; the site is unsustainable, undeliverable and does not represent a garden village; infrastructure capacity constraints and impact on infrastructure (particularly highways); cumulative impact with saved SAMDev Plan allocations; separation from existing built form caused by the A458; distance to employment and implications for commuting; lack of need/demand; market capacity; impact on the proposed relocation of the livestock; site constraints such as flood risk, landscape/visual, loss of agricultural land, heritage, ecology, public protection issues (including associated with the proposed relocation of the livestock market, proposed poultry units, existing/proposed mineral working, existing/proposed commercial activities and roads), and mineral sterilisation; impact on adjacent land uses/land users; and conflict with proposals in previous stages of consultation.</p> <p>6. Lack of evidence and/or consideration of reasonable alternatives to support proposed allocation BRD030.</p> <p>7. Comments on the draft site guidelines for proposed allocation BRD030, including in relation to playing fields, on-site renewable energy, types of employment; the local centre and other services/facilities; poultry units and non-designated heritage assets.</p> <p>8. Objections to the proposed potential future direction of growth.</p> <p>9. Objections to proposed employment allocations STC002 and P58a. Reasoning for objections varied, but included such factors as: lack of need/demand; existing/proposed alternative employment sites available (some suggested it may undermine their viability others suggested capacity remained within the existing Stanmore Industrial Estate); separation from Bridgnorth/rural location; lack of exceptional circumstances to justify the release of Green Belt land; site constraints such as loss of agricultural land and impact on Green Belt.</p> <p>10. Concern raised about the potential for waste management facilities on proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth).</p> <p>11. Comments on the draft site guidelines for proposed allocations STC002 and P58a, including in relation to types of employment.</p> <p>Additional/alternative site allocations and/or safeguarded land proposed - suggestions these are more suitable and sustainable than those proposed.</p> <p>12. Consultation was inconsistent and inappropriate and views expressed have not been considered.</p>	<p>Shropshire Council considers a proportionate and robust evidence base has been prepared to inform the Local Plan Review. This includes such evidence as a Viability Study, Local Housing Need Assessment, Strategic Housing Market Assessment, Place Plans and Strategic Infrastructure Implementation Plan, Economic Development Needs Assessment and Employment Land Review.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>The proposed strategic approach provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt.</p> <p>Draft site guidelines for the proposed mixed-use allocation BRD030 provide a framework for any future masterplanning and development of the site. They address such issues as compliance with the principles of a garden village; infrastructure provision; and key design/layout considerations. Furthermore, they also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document (SPD), this process will allow for more detailed consideration of any future development. To provide clarity minor modifications are proposed to these draft site guidelines including in relation to playing pitches, the need for the SPD to be adopted before determination of a Planning Application on the site and the need for heritage assessment to inform the Planning Application process.</p> <p>The potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>With regard to proposed employment allocations STC002 and P58a, they are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page.</p> <p>Draft site guidelines provide a framework for any future development of these sites. For clarity, a minor modification is proposed to the draft site guidelines for these sites regarding the types of employment uses appropriate.</p> <p>Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications.</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for the detailed consideration of the specific development proposals. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p> <p>With regard to infrastructure provision, it is important to note that the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements or identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for a site.</p> <p>As part of the Local Plan Review process, Shropshire Council has engaged with key infrastructure providers and prepared/considered evidence on infrastructure capacity and needs as appropriate to inform proposed policies, including development strategies for specific settlements, and proposed allocations. The evidence base for the Local Plan Review</p>



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		<p>includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans.</p> <p>The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>
S3.2. Community Hubs: Bridgnorth Place Plan Area	<ol style="list-style-type: none"> <li>1. Comments on the site guidelines for allocation ALV009 in Alveley seeking amendment of requirements.</li> <li>2. Comments requesting the removal of the proposed allocation ALV009. Site constraints not considered.</li> <li>3. Comments on the proposed residential guideline for Alveley in relation to recent commitments and completion data. Additional housing not required due to significant delivery and remaining commitments.</li> <li>4. Infrastructure and service improvements required to support development</li> <li>5. Safeguarded land not required, retain as Green Belt.</li> <li>6. Green Belt/site assessment process inconsistent and not appropriate</li> <li>7. Evidence inadequate to support appropriate approach to development</li> <li>8. Responses not considered.</li> </ol>	<p>Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable, and deliverable. The Draft Plan strategy has focused development in principal and key centres, but Green Belt release, to provide for allocations, are identified for Alveley to support its continuing role as a Community Hub as detailed within the exceptional circumstances statement. Allocation of sites in different parts of the village provides alternative delivery options. Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. The methodology used within the Green Belt Assessment and Review undertaken to inform the Local Plan Review and other evidence is considered appropriate, proportionate, and robust.</p> <p>Existing commitments and development in Alveley during the Plan period (2016-2038) are taken into account and contribute to the housing guideline figure. The exceptional circumstances statement details potential compensatory improvements to the Green Belt, including opportunities to for improving access.</p> <p>Local Plans must be regularly reviewed and at the early review of the adopted Plan (SAMDev DPD) was required. The Draft Local Plan does not need to replicate the adopted plan but does needs to be in line national policy. As part of the review process housing and employment land requirements over the whole Plan period and beyond in the case of Green Belt review, must be considered. Alveley as a Community Hub is a sustainable location and focus for development in the rural area. Any housing delivery and existing commitments, together with constraints, are taken into account as part of the overall housing requirement and site assessments are carried out to consider the suitability of sites for allocation. National Policy relating to Green Belt has been taken into account and exceptional circumstances are identified for Green Belt boundary changes to support identified options for delivering sustainable development. In accordance with national policy safeguarded land is identified to meet needs beyond the current Plan period.</p> <p>Complaints submitted about the approval process for planning applications are required to be dealt with through a separate process to the examination of a Local Plan. All representations received in response to Local Plan consultations are considered.</p>
S3.3. Community Clusters: Bridgnorth Place Plan Area	N/A	N/A
S3.4. Wider Rural Area: Bridgnorth Place Plan Area	N/A	N/A
S4. Broseley Place Plan Area	See S4.1-S4.4	See S4.1-S4.4
S4.1. Development Strategy: Broseley Key Centre	1. Objection to the lack of proposed allocations to achieve the proposed development strategy for Broseley.	A Neighbourhood Plan is being progressed for the Broseley Town Council area. The Neighbourhood Plan will include the strategy for achieving the housing and employment guidelines for the Key Centre of Broseley.
S4.2. Community Hubs: Broseley Place Plan Area	N/A	N/A
S4.3. Community Clusters: Broseley Place Plan Area	N/A	N/A
S4.4. Wider Rural Area: Broseley Place Plan Area	N/A	N/A

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S5. Church Stretton Plan Area	See S5.1-S5.4	See S5.1-S5.4
S5.1. Development Strategy: Church Stretton Key Centre	<p>1. Objections to the level of residential development proposed for Church Stretton. Some objections felt the proposed residential guideline was too high (often referencing the location of Church Stretton within the AONB and/or lack of need/need for settlement specific assessments of local housing need), whilst others felt it was too low (reference made to the size of the settlement and/or level of services/facilities and/or housing need).</p> <p>2. Objections to the proposed approach to delivering the proposed residential guideline. Reasoning for objections varied, but included the level/reliance on windfall development, reliance on the saved SAMDev Plan residential allocation, lack of proposed allocations, limited capacity of brownfield sites and potential conflict with AONB status.</p> <p>3. Concerns about deliverability of the saved SAMDev Plan employment allocation.</p> <p>4. Sites proposed for allocation.</p> <p>5. Need for evidence of demand for affordable housing.</p> <p>6. Amend the proposed development boundary to include existing dwellings.</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Church Stretton and the existing commitments (including the existing allocations) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints, and opportunities, including its location within the Shropshire Hills AONB.</p> <p>With regard to demand for affordable housing, Shropshire Council would highlight that there are currently 88 households on the HomePoint housing waiting list which have identified a first preference to live in Church Stretton, of which 78 have indicated at least one local connection to the town (a breakdown of the bedroom number requirements for these is as follows: 37 x 1 bed; 26 x 2 bed; 14 x 3 bed; and 1 x 4 bed). We would also note that Church Stretton Town Council have recently undertaken a housing survey for Church Stretton town, which was supported by Shropshire Council.</p> <p>Shropshire Council also considers that the proposed development boundary for Church Stretton is appropriate. Generally, we exclude affordable housing exception sites such as those referenced from development boundaries.</p>
S5.2. Community Hubs: Church Stretton Place Plan Area	1. All Stretton should be identified as a proposed Community Hub/Community Cluster.	Shropshire Council considers that the approach to identifying proposed Community Hubs, through a Hierarchy of Settlements Assessment, is appropriate. It is also considered that the methodology applied within the Hierarchy of Settlements Assessment, is appropriate and has been applied consistently across Shropshire. As such the list of proposed Community Hubs is considered appropriate.
S5.3. Community Clusters: Church Stretton Place Plan Area	1. All Stretton should be identified as a proposed Community Hub/Community Cluster.	Shropshire Council considers that the approach used to identify Community Clusters, by which communities can opt-in or opt-out is appropriate and reflects the intended purpose of such Community Clusters - settlements with aspirations to maintain or enhance their sustainability.
S5.4. Wider Rural Area: Church Stretton Place Plan Area	N/A	N/A
S6. Cleobury Mortimer Plan Area	See S6.1-S6.4	See S6.1-S6.4
S6.1. Development Strategy: Cleobury Mortimer Key Centre	N/A	N/A
S6.2. Community Hubs: Cleobury Mortimer Place Plan Area	N/A	N/A
S6.3. Community Clusters: Cleobury Mortimer Place Plan Area	N/A	N/A
S6.4. Wider Rural Area: Cleobury Mortimer Place Plan Area	N/A	N/A
S7. Craven Arms Place Plan Area	See S7.1-S7.4	See S7.1-S7.4
S7.1. Development Strategy: Craven Arms Town	1. Respondents recognise Craven Arms is a Key Centre located on the A49 strategic corridor, identified as a focus for growth in the strategic approach of the draft Shropshire Local Plan and is well placed to help meet needs, as reflected in the 500 dwelling guideline proposed for the settlement. To ensure these objectives can be met, it is suggested that a 25% non-delivery allowance should be applied across Shropshire, increasing the Craven Arms housing guideline	The adopted Local Plan in the Site Allocations and Management of Development Plan (SAMDev Plan, 2015) set out an ambitious development strategy for Craven Arms. This strategy is proposed to be transferred in its entirety into the draft Shropshire Local Plan with the addition of a windfall allowance for 90 dwellings for further small sale housing development within the town in the period to 2038. This ambitious strategy will strengthen the role and function of Craven Arms as a Key Centre and a principal 'service' settlement for the adjoining rural areas particularly within the Shropshire Area of Outstanding Natural Beauty along the Clun/Kemp valley (west) and Corvedale (east). The strategy also reflects the location of Craven

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	<p>figure from 500 dwellings to 625 dwellings.</p> <p>2. Respondents to the Local Plan wish to see more housing delivered on viable types of site/viable locations, in order for the Plan to meet the 'justified' and 'effective' tests of soundness. This includes small greenfield sites in the more viable south of the County.</p> <p>3. Respondents to the Local Plan consider that the latest 2018-based household housing projections show a significant additional need for housing exacerbated by Covid-19 increasing demand in Shropshire which is expected to continue due to home working and reduced commuting. The provision of more housing allocations will ensure the Plan is 'positively prepared' and 'justified', sufficient delivery to meet the County's housing needs and avoid further affordability issues in the housing market.</p> <p>4. Respondents to the Local Plan consider that development in Craven Arms is reliant on SAMDev allocations CRAV003 &amp; CRAV009 for 235 dwellings and CRAV024 for 25 dwellings which do not have planning permission and have not been delivered. The viability of Shropshire would indicate that larger greenfield sites like CRAV003 &amp; CRAV009 are unviable. In contrast, the smaller greenfield SAMDev allocations CRAV002 has been built and CRAV004 &amp; CRAV010 are currently being developed. To meet the 'effective' test of soundness, additional allocations are needed and sites CRA023, CRA024 and CRA025 located to the west of Watling Street should be proposed allocations within the development boundary.</p> <p>5. Respondent to the Local Plan wishes to see CRA015 (0.87ha) allocated for housing development to contribute towards the target of 500 dwellings by 2038. CRA015 is considered by the respondent to be a suitably located site to the west of Watling Street comprising a fairly flat, infilling opportunity between existing housing and a recent housing development with no known flood risk.</p>	<p>Arms on the strategic corridor of the A49 Trunk Road through south Shropshire and the proposed function of the town as a key growth point supporting the historic Market Town of Ludlow (south) and the historic Key Centre of Church Stretton. This also reflects the more commercial history and character of the centre and eastern areas of the town and Craven Arms situation as an important station stop on the Shrewsbury – Cardiff rail line at the junction with the Heart of Wales line serving mid-Wales. The town is also the business location for a key local employer (Euro Quality Lambs) that is looking to locate and expand from the centre of the town to a new bespoke site in the north of Craven Arms to create the Newington Food Park which is expected to drive the development of further employment sites allocated in the north of the town including the Phase 2 expansion of the successful Craven Arms Business Park. Shropshire Council and its partners, including Craven Arms Town Council, consider the proposed strategic approach to the level and distribution of development in Shropshire to be appropriate, effective, sustainable and deliverable including the allocations in the draft Local plan that have been saved from the currently adopted SAMDev Plan. These saved allocations in Craven Arms almost entirely comprise larger greenfield sites for which there should be a ready market and reasonable levels of viability to deliver the proposed development. It is recognised that the more commercial character of Craven Arms means that the market in this town is not as strong and resilient as the other historic towns on Ludlow and Church Stretton located on the a49 in south Shropshire. For the time being, the Brexit decision and the Covid-19 downturn have affected the delivery of the Craven Arms strategy. The strategy is also affected by further strategic infrastructure requirements to deliver a new strategic highway junction on the A49, a strategic highway link between the north and the west of the town, bridging the Shrewsbury-Cardiff rail line and serving the employment allocations to the north and the housing allocations in the west along the urban boundary on Watling Street between the town to the east and the open countryside and AONB to the west. The delivery of this strategic infrastructure will facilitate the closure of the key level crossing (at Long Lane) and avoid the proposed automation of this crossing that is expected to cause traffic delays and queues onto the A49 affecting the safe operation of this strategic Trunk Road that also serves commercial traffic crossing and serving Mid and North Wales. The Council is supporting a partnership of landowners and developers in Craven Arms to deliver this strategic infrastructure in order to help trigger the delivery of the development strategy for Craven Arms set out in the draft Shropshire Local Plan. Shropshire Council with the Craven Arms Town Council have considered whether to make further land allocations in the draft Local plan to help deliver the strategy by enhancing the viability of the overall scheme as suggested in the Craven Arms Development Brief submitted by a respondent to the draft Local Plan. The preferred strategy agreed with Craven Arms Town Council is to make a small windfall allowance for available for smaller developers to balance the larger development opportunities in the town and to help broaden the range, choice, and affordability of new housing in the town up to 2038. It is also recognised that Watling Street forms a strong and defensible boundary to western areas of the town and separates the urban areas from the countryside and AONB that encloses the north and west of Craven Arms. Consequently, sites CRA015, CRA023, CRA024 and CRA025 are not considered to be necessary or sustainable additions to the development strategy for Craven Arms. These sites would also affect the setting of the settlements and heritage assets in the adjoining Sibdon Carwood Parish in a location previously only considered for development to deliver an exceptional affordable housing scheme referenced by the respondent proposing sites CRA015. Shropshire Council therefore consider the strategy for Craven Arms to be appropriate, effective, sustainable, and deliverable without further allocations including sites CRA015, CRA023, CRA024 and CRA025.</p>
S7.2. Community Hubs: Craven Arms Place Plan Area	N/A	N/A
S7.3. Community Clusters: Craven Arms Place Plan Area	N/A	N/A
S7.4. Wider Rural Area: Craven Arms Place Plan Area	N/A	N/A
S8. Ellesmere Plan Area	See S8.1-S8.4	See S8.1-S8.4
S8.1. Development Strategy: Ellesmere Key Centre	<p>1. Objections to the proposed approach to delivering the proposed residential guideline. Reasoning for objections included reliance on windfall development, reliance on the existing mixed-use allocation and capacity of the proposed allocation.</p> <p>2. Sites proposed for allocation.</p> <p>3. The proposed development boundary for Ellesmere should be amended.</p>	<p>Shropshire Council considers that the proposed development strategy for Ellesmere and the existing commitments (including the existing allocations), proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints, and opportunities.</p> <p>In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken. Shropshire Council also considers that the proposed development boundary for Ellesmere is appropriate.</p>



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S8.2. Community Hubs: Ellesmere Place Plan Area	<ol style="list-style-type: none"> <li>1. Existing allocation DUDH006 should be de-allocated/reviewed.</li> <li>2. Welshampton should be identified as a proposed Community Hub/Community Cluster.</li> <li>3. Cockshutt should be identified as a proposed Community Hub.</li> </ol>	<p>Shropshire Council considers that the proposed development strategy for Dudleston Heath and the existing commitments (including the existing allocation), and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints, and opportunities.</p> <p>Proposed saved SAMDev Allocations have previously been the subject of assessment and examination. Shropshire Council considers that the approach to identifying proposed Community Hubs, through a Hierarchy of Settlements Assessment, is appropriate. It is also considered that the methodology applied within the Hierarchy of Settlements Assessment, is appropriate and has been applied consistently across Shropshire. As such the list of proposed Community Hubs is considered appropriate.</p>
S8.3. Community Clusters: Ellesmere Place Plan Area	<ol style="list-style-type: none"> <li>1. Welshampton should be identified as a proposed Community Hub/Community Cluster.</li> </ol>	<p>Shropshire Council considers that the approach used to identify Community Clusters, by which communities can opt-in or opt-out is appropriate and reflects the intended purpose of such Community Clusters - settlements with aspirations to maintain or enhance their sustainability.</p>
S8.4. Wider Rural Area: Ellesmere Place Plan Area	N/A	N/A
S9. Highley Place Plan Area	See S9.1-S9.4	See S9.1-S9.4
S9.1. Development Strategy: Highley Key Centre	<ol style="list-style-type: none"> <li>1. Objections to the level of residential development proposed for Highley.</li> <li>2. Objections to proposed allocation HNN016. Reasoning for objections varied, but included failure to consider community views; the size and relationship of the site to existing built form; access/highway constraints; infrastructure capacity; and heritage impact.</li> <li>3. Concern about the site assessment process and promotion of alternative site allocations.</li> <li>4. Concern about infrastructure capacity.</li> <li>5. Representations on the draft site guidelines for proposed allocation HNN016, including in relation to highways and heritage.</li> </ol>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council also considers that the proposed development strategy for Highley and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints, and opportunities.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, and landscape/visual sensitivity.</p> <p>Draft site guidelines for proposed allocation HNN016 are considered to provide an appropriate framework for any future development of the site. However, minor modifications are proposed to clarify the need for highway and heritage assessments to inform any future development of the site.</p>
S9.2. Community Hubs: Highley Place Plan Area	N/A	N/A
S9.3. Community Clusters: Highley Place Plan Area	N/A	N/A
S9.4. Wider Rural Area: Highley Place Plan Area	N/A	N/A
S10. Ludlow Place Plan Area	See S10.1-S10.4	See S10.1-S10.4

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<p>S10.1. Development Strategy: Ludlow Town</p>	<p>1. Respondents to the Local Plan support draft Policy S10.1(ii) and the Ludlow Policy Map Inset including proposed employment allocation LUD052 which will make a significant and unique contribution to the employment growth needs of the town and realising the objectives of the Economic Growth Strategy/draft Ludlow Local Economic Growth Strategy). Together with saved employment allocation ELR058, these sites are considered to be unconstrained, viable and deliverable/developable.</p> <p>2. Ludford Parish Council requests a moratorium on the use of extensive, greenfield sites within Ludford Parish for the length of the plan period (to 2038); stronger protection of the countryside between Ludford Village (including the Conservation Area) south to the Parish Boundary to also protect the historic southern entrance to Ludlow; areas east of the A49 and also wishes to see the reproduction of the Parish Boundary on the draft Local Plan Policy Map or other documents within the Plan.</p> <p>3. Respondents to the Local Plan support the proposed development guidelines for employment allocation LUD052 to require consideration of the built development heights to take into account impacts, particularly longer-term effects of cumulative development, on the setting of Caynham Camp.</p> <p>4. Respondents to the Local Plan wish site LUD012 at The Linney to be allocated for housing development as the site is a logical infill opportunity, in a sustainable location providing easy access to a range of services and facilities which could help meet the housing needs of older residents which is a significant source of housing demand in Shropshire.</p>	<p>Shropshire Council welcomes the support for Policy S10.1 recognising the strategy for the Market Town of Ludlow provides an opportunity to deliver new housing and employment development to strengthen the role and function of this Market Town and to support the rural settlements and communities in the Ludlow Place Plan area. Ludlow is the principal Market Town and service centre in the south of the County, located on the strategic corridor of the A49 Trunk Road between the Herefordshire border (south) and the Key Centres of Craven Arms and Church Stretton to the north. As the principal Market Town, the draft Local Plan identifies a strategy for Ludlow comprising a development guideline of 1,000 dwellings and 11 hectares of employment development to be delivered through the addition of two new housing allocations both comprising brownfield sites within the town and a new employment allocation LUD052 to extend saved allocation ELR058 to the east of Ludlow on The Sheet, which is a local road through Ludford Parish. In identifying the two proposed, brownfield housing allocations, a comprehensive site assessment process was undertaken including consideration of other promoted sites including LUD012. This site has previously been refused for development for reasons including impacts on heritage assets within the town including the Grade I listed Ludlow Castle. The comparative benefits of the proposed allocations, compared to promoted site LUD012 and the significant housing commitments approved in the town, indicates that LUD012 on The Linney is not required for development in Ludlow at this point in time. In identifying the proposed employment allocation LUD052, it is recognised that development may affect the heritage assets in Ludlow and in the surrounding Ludford Parish and a minor modification is proposed to the 5th paragraph of the draft site guidelines for LUD052 in Schedule 10.1(ii) to require the design of development to pay particular attention to building height, layout and materials. The draft Local Plan provides for a development boundary around the Market Town of Ludlow to tightly contain the proposed development of the town and its adjacent employment area. This principally comprises the proposed allocations, an extensive number of committed sites for housing development all located within the town and two larger greenfield sites both granted approval on appeal. These are located at Foldgate lane (south) and Bromfield Road (north) along with the proposed greenfield employment allocations at The Sheet. These greenfield allocations are all contained within the proposed development boundary around Ludlow. Shropshire Council considers this strategy to be appropriate, effective, sustainable, and deliverable and that it satisfies the scale of development required in Ludlow and makes a significant contribution to the development needs of the south of the County. There is no apparent need for further land releases for development around Ludlow and the proposed policy framework of the draft Local Plan provides an appropriate level of protection to the countryside in the Parish of Ludford surrounding the Market Town of Ludlow.</p>
<p>S10.2. Community Hubs: Ludlow Place Plan Area</p>	<p>1. Respondents to the Local Plan highlight that an additional 190 dwellings at Burford (which probably equates to around an additional 440 residents) might place additional demands on existing services, such as doctors, at Tenbury which are presently stretched. The impact on local services at Tenbury needs to be taken into account in any housing allocations at Burford.</p> <p>2. Respondents to the Local Plan identify that South Worcestershire Councils have prepared an emerging housing requirement for Tenbury Wells. It is suggested that a NDP is still being prepared and that the Shropshire Local Plan should recognise that Tenbury and Burford is a designated Neighbourhood Plan Area. It is requested that Shropshire Council and the South Worcestershire Councils liaise to jointly agree a housing requirement for the Tenbury and Burford Neighbourhood Plan Area.</p> <p>3. Respondents to the Local Plan have expressed concern about a possible loss of flood plain and potential flooding problems on proposed allocation BUR002 due to proximity to the River Teme and the presence of a borehole on the site which will need to be appropriately decommissioned.</p> <p>4. Respondents to the Local Plan request that the site capacity for BUR004 should be expressed as 'approximately 100 dwellings; to allow for a reasonable amount of flexibility in dwelling numbers, in response to a more detailed assessment of the site's capacity.</p> <p>5. Respondents to the Local Plan request that land at BUR008 be proposed to be allocated in the draft Local Plan. BUR008 is situated to the west of preferred allocation BUR002 is well related to the settlement of Burford and could provide land for employment use to meet the needs of existing local businesses seeking local expansion opportunities as well as additional housing provision including custom/self-build housing to meet demand in the south of the County. The land is promoted by a significant local business with the resources to deliver the development proposed for the site.</p>	<p>Shropshire Council considers the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. The methodology within the Hierarchy of Settlements Assessment (HoS) is appropriate and applied consistently across Shropshire, including in relation to Burford which is appropriately identified as a Community Hub. It is recognised that the draft Shropshire Local Plan was prepared at a time when it was proposed to prepare a Neighbourhood Development Plan (NDP) for Burford and Tenbury Wells. The draft Local Plan preceded the NDP and met the development needs of Burford and so, no further provision is required in Burford at this time. If the NDP should precede the South Worcestershire Plan then it may be possible for the development needs of Tenbury to be met through the NDP. This also reflects the functional relationship between the adjacent towns of Burford and Tenbury which share key services across the River Teme Bridge. Consequently, where development in Burford is required to contribute towards sustaining key local services, this might include services located in Tenbury. The draft Local Plan identifies for Burford, a development guideline of 190 dwellings, a development boundary and housing allocations on sites BUR002 and BUR004 (with site BUR001 under construction for a mixed tenure affordable housing scheme). The development guidelines for the proposed allocation include an indicative site capacity subject to the proposed design, any site constraints, and the need for mitigation measures. It is recognised that BUR002 requires further investigation of the heritage assets adjoining the site, the possible presence of a former borehole within the site and already proposes measures to manage any longer-term flood risk from the River Teme. The proposed allocations were identified through a comprehensive site assessment process with other promoted sites including site BUR008. Sites BUR002 and BUR004 are the preferred sites, considered to be appropriate, effective, sustainable, and deliverable and provide for an appropriate development boundary Burford. The boundary contains the village to the west and east of the River Teme Bridge into Tenbury enclosing the principal services in Burford and including to the west, site BUR002 and the Lower Teme Business Park. The promoted site BUR008 is situated beyond the Lower Teme Business Park and forms part of the countryside surrounding the town and extends down into the floodplain of the River Teme. The comparative benefits of the proposed allocations compared with BUR008, the already significant scale of the development proposed in Burford and the capacity of sites BUR002 and BUR004 means site BUR008 is not required at this time. Whilst, BUR008 is proposed for employment development, the demands which were expressed by local companies in recent times are likely to be met in other locations. The need for further employment land provision in Burford beyond the significant areas on the Upper and Lower Teme Business Parks is not made out at this time.</p> <p>Shropshire Council welcomes the support for Policy S10.2 recognising that the village of Clee Hill is appropriately designated</p>



Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
	6. Respondents to the Local Plan support the requirement in the development guidelines for a heritage assessment and archaeological investigation of site CHK002 in Clee Hill to conform with national and local heritage policies.	as a Community Hub and that the strategy will provide an opportunity to deliver new housing in the rural area around the Market Town of Ludlow. This strategy has identified a suitable housing allocation on site CHK002 which will be subject to the assessment of any impacts from this development on the former coal and ironstone workings around Clee Hill through a heritage impact assessment and archaeological investigation. The support for the development guidelines for proposed housing allocation on site CHK002 is also welcomed.
S10.3. Community Clusters: Ludlow Place Plan Area	N/A	N/A
S10.4. Rural Area Allocations: Ludlow Place Plan Area	N/A	N/A
S11. Market Drayton Place Plan Area	See S11.1-S11.4	See S11.1-S11.4
S11.1. Development Strategy: Market Drayton Principal Centre	<ol style="list-style-type: none"> <li>1. The proposed residential guideline should be increased.</li> <li>2. The residential guideline should be expressed as a minimum.</li> <li>3. The proposed employment land guideline is not justified.</li> <li>4. Objections to proposed allocations. Including because of viability concerns (linked to the relocation of the Greenfields Sports Facilities and proposed Marina), site constraints (including, poor performance within the Sustainability Appraisal and relationship to the existing built form.</li> <li>6. Objection to the sustainability appraisal and site assessment process.</li> <li>7. Sites proposed for allocation in addition/instead of proposed allocations. Some of these promotions suggested they could support wider aspirations such as relocation of the Greenfields Sports Hub.</li> <li>8. Representations on the proposed capacity, timescales, and site guidelines for specific allocations. This included recognising potential for sites to cross-subsidise either the relocation of Greenfields Sports Hub and the proposed Marina.</li> <li>9. Concern about the proposed marina not being required within draft Policy S11.1 or identified on the draft Policies Map.</li> <li>10. Concern regarding the certainty and viability of the proposed relocation of Greenfields Sports Hub.</li> </ol>	<p>Shropshire Council considers that the proposed development strategy for Market Drayton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy SP7 recognises that residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such, draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.</p> <p>The proposed employment land guideline for Market Drayton provides appropriate choice and competition within the market, recognises the role of Market Drayton and its contribution towards strategic growth objectives in the north-east of the County and responds to the needs of the town and its surrounding hinterland, including providing opportunities for existing businesses to expand and opportunities associated with High Speed 2. It is noted that no additional employment land allocations are proposed for Market Drayton.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, and landscape/visual sensitivity. Shropshire Council considers that this assessment process and the wider Sustainability Appraisal is appropriate and robust.</p> <p>Para 7 of Draft Policy S11.1 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage. The draft site guidelines for proposed allocations are also considered appropriate.</p> <p>Draft site guidelines are also generally considered appropriate.</p> <p>It is recognised that the proposed site guidelines for MR012 and MDR034 do not include a requirement to financially cross-subsidise a proposed marina on land at Victoria Farm. The draft Plan does not specifically seek to allocate land for a Marina following consultation comments at the Regulation 18 stage from the Canal &amp; River Trust, and instead policies S11.1, DP10 and SP7 provide a sufficient policy framework should such a proposal come forward during the plan period. CIL contributions from this and other development sites can of course contribute towards the delivery of a marina. However, importantly, these sites will support improved pedestrian and cycle links the delivery of the proposed marina development and as such indirectly cross-subsidise its delivery, through enhancements to connectivity between the proposed marina site and the town - this is recognised within the proposed site guidelines for these proposed allocations which include "pedestrian and cycle links will be enhanced or provided through the site and linking into the town and to the proposed marina in order to improve the site's overall sustainability". However, for clarity a minor modification is proposed to recognise that pedestrian and cycle links associated with MDR012 and MDR034 should connect to the canal towpath and any proposed marina.</p> <p>The relocation of the Market Drayton sports facilities, currently located at Greenfields (on land owned by Shropshire Council), is a major local priority, having been considered as part of the draft Market Drayton Neighbourhood Plan. The Council is seeking to plan positively for this delivery and in doing so continue to assess the overall viability of the relocation of the current sports facilities at Greenfields, which includes an assessment of likely relocation costs, against an assessment of the</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
		<p>likely re-use of the current site for alternative uses. This is recognised in paragraph 5.154 of the draft Local Plan. It is currently considered that the proposed relocation remains a viable proposition and is supported locally by the Town Council. The proposed housing scheme at Longford Turning (MDR039/MDR043) is required to enable sufficient improvements to the pedestrian, cycle, and vehicle accessibility into the proposed relocation site (identified as a broad location on the draft Policies Map). In addition, there is the potential for CIL funding to support the wider improvements necessary and which could be used as 'gap' funding.</p> <p>It is considered the current draft policy in S11.1(3), which specifies "that the relocation of Market Drayton Sports facilities from its current site on Greenfields Lane to land at Longford Turning, identified on the Policies Map, to enable the delivery of new facilities to at least equitable standard" provides sufficient certainty regarding the proposed location and quality of the new facility. Furthermore, the draft Shropshire Local Plan should be read as a whole, draft Policy DP15 would apply to any proposals for relation of the Market Drayton Sports facilities.</p>
S11.2. Community Hubs: Market Drayton Place Plan Area	<ol style="list-style-type: none"> <li>1. Comments requesting further settlements to be included (as Hubs, Clusters) with housing guidelines.</li> <li>2. Draft Policy S11.2 should be revised to indicate employment development, including on sites that may lie just outside the development boundaries of Community Hubs, will be considered seriously and planned development on such sites will be encouraged. Site HKW014 should be allocated for employment development (an identified on the Inset Map for Hinstock as such). Uses could include Class B, E, C2 and C2A and sui generis uses.</li> <li>3. Comments on the lack of time for sites to be promoted, and some information being incorrect during the site selection and site assessment processes.</li> <li>4. Undertake further analysis of the site, in line with the methodology set out in HEAN 3, prior to allocation. This should consider the degree of harmful impact resulting from development of HHH001 and HHH014 on the significance, derived from its setting, of the registered park and garden and potentially the other heritage assets within it.</li> </ol> <p>Amend the proposed site guidelines for HHH001 and HHH014 to include the detailed measures identified within the Supplementary Site Assessment. Such as: low density development; incorporating well designed landscape and amenity space; good quality timber joinery detailing; and a palate of materials that is informed by, and in keeping with, the local vernacular.</p> <ol style="list-style-type: none"> <li>5. There should be housing allocations in Woore.</li> </ol>	<p>Shropshire Council undertook a robust Hierarchy of Settlements process where those with too low a score were not classified as Hubs due to their lack of facilities and services.</p> <p>Shropshire Council considers that the proposed development strategy for Market Drayton and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The Call for Sites was undertaken in 2017 and landowners had the opportunity for years after this to promote their land as part of the Local Plan Review. It is therefore considered that landowners or those representing them had significant time to promote their land for development, and Shropshire Council undertook a long and robust site assessment process which ultimately led to the preferred allocations.</p> <p>It is considered that sufficient analysis of the impact of development on the significance of Hodnet Hall Registered Park and Garden and its setting has been undertaken both through the site assessment process and the Supplementary Site Assessment carried out by the Historic Environment Manager. However, a minor modification is proposed to the 3rd paragraph of the draft site guidelines for site HHH001 and HHH014 in Schedule 11.2 to reflect the need for good quality timber joinery detailing and a palate of materials informed by, and in keeping with, the local vernacular</p> <p>Shropshire Council considers the proposals for Woore is appropriate. It should be noted that the Woore Neighbourhood Plan was recently adopted and allows for housing development in the settlement.</p>
S11.3. Community Clusters: Market Drayton Place Plan Area	N/A	N/A
S11.4. Rural Area Allocations: Market Drayton Place Plan Area	N/A	N/A
S12. Minsterley and Pontesbury Place Plan Area	See S12.1-S12.4	See S12.1-S12.4
S12.1. Development Strategy: Minsterley and Pontesbury Community Hubs	<ol style="list-style-type: none"> <li>1. Settlement housing guideline too low and should be increased</li> <li>2. Comments on how the housing guideline should be increased on the allocations.</li> <li>3. Comments on how other sites should also be included as housing allocations, as well as amending the Development Boundary to incorporate sites/properties.</li> </ol>	<p>Shropshire Council considers that the proposed development strategy for Minsterley &amp; Pontesbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>Shropshire Council considers the proposed capacities of the preferred allocations are appropriate. It should be noted that Para 4 of Draft Policy S12.1 recognises that the Provision figures are 'approximate'. Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.</p> <p>Shropshire Council have undertaken a robust assessment of all of the promoted sites and consider the approach taken to the preferred allocations (as well as the Development Boundaries) as being reasonable and appropriate for the Local Plan.</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S12.2. Community Clusters: Minsterley and Pontesbury Place Plan Area	N/A	N/A
S12.3. Wider Rural Area: Minsterley and Pontesbury Place Plan Area	N/A	N/A
S13. Much Wenlock Place Plan Area	See S13.1-S13.4	See S13.1-S13.4
S13.1. Development Strategy: Much Wenlock Key Centre	<ol style="list-style-type: none"> <li>1. Flood risk has not been adequately considered for the proposed site allocation (MUW012VAR).</li> <li>2. The development strategy for Much Wenlock is not in accord with the Neighbourhood Plan for the town.</li> <li>3. Previous community consultation responses have not been taken into account.</li> </ol>	<ol style="list-style-type: none"> <li>1. The Council has considered flood risk through its Strategic Flood Risk Assessments (Stages 1 and 2) and these have informed the proposed site allocation and the Sequential and Exception Tests.</li> <li>2. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides an appropriate development strategy for the settlement.</li> <li>3. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy</li> </ol>
S13.2. Community Hubs: Much Wenlock Place Plan Area	<ol style="list-style-type: none"> <li>1. Respondents to the Local Plan welcomed Policy S13.2 and the development strategy for Cressage.</li> <li>2. Respondents to the Local Plan considered that the housing guideline figure for Cressage should be increased to 140 dwellings and site CES002 at Shore Lane should also be allocated for a mixed housing and employment development in the village.</li> <li>3. Respondents to the Local Plan wish the Inspector to consider the scoring system for designating Community Hubs which is considered to be flawed and consequently, Cressage should continue to be designated as a settlement in the countryside.</li> <li>4. Respondents to the Local Plan consider that a housing need assessment is required for Cressage to determine whether there is a sufficient demand for new housing to justify its designation as a Community Hub.</li> <li>5. Respondents to the Local Plan wish the Inspector to consider whether appropriate consideration and weight has been given to previous consultation responses and whether adequate time and facilities were provided for the current consultation during the pandemic.</li> <li>6. Respondents to the Local Plan wish the Inspector to assess the infrastructure and facilities in Cressage to determine whether the village might support large development bringing more housing and residents into the village.</li> <li>7. Respondents to the Local Plan wish the Council to clarify the number of dwellings to be delivered on site CES006 for the conversion of the former Eagles public house and redevelopment of the car park.</li> <li>8. Respondents to the Local Plan wish the allocation of site CES005 at The Vicarage to more fully evaluated including the traffic safety measures including footways and traffic calming measures or ideally that the A458 be re-routed to by-pass Cressage.</li> </ol>	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable, and deliverable. The identification of proposed allocations were informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways matters with colleagues in the Developing Highways team. Sites have been chosen that will deliver a range of benefits for the community including measures to address the issue of traffic speeding through the speed restricted zones of the village. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community. This will require a suitable scale of development for Cressage and the relatively modest housing guideline figure of 80 dwellings is considered to be appropriate to the size and function of the settlement. The greater proportion of this requirement is to be delivered on site CES005 (60 dwellings) which comprises a relatively flat, open, and accessible development opportunity. The design of the development scheme for this site may have a positive impact on the traffic flows through the village. Residents of the proposed development will also have ready access to the principal services in the village particularly through the footway network within the village. Shropshire Council considers that the approximate site capacity</p>



Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
		<p>specified for site CES006 (around 4 houses) is appropriate. This capacity is considered likely to consist of either 1 resulting from the conversion of the existing building and 3 within the wider site or 2 resulting from the conversion of the existing building and 2 within the wider site, dependent on the nature of development undertaken. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>
S13.3. Community Clusters: Much Wenlock Place Plan Area	N/A	N/A
S13.4. Wider Rural Area: Much Wenlock Place Plan Area	N/A	N/A
S14. Oswestry Place Plan Area	See S14.1-S14.4	See S14.1-S14.4
S14.1. Development Strategy: Oswestry Principal Centre	<ol style="list-style-type: none"> <li>1. Hubs and Clusters should all be removed with the focus on the town itself. Previously removed housing allocations should be reinstated, with any potential constraints mitigated against as well as other potential sites in the area promoted.</li> <li>2. Significant development already occurred in Park Hall already. Insufficient infrastructure, school capacity and poor roads for further development. There is a need to widen and better maintain roads (including flood defences for Burma Road) and extend the pedestrian links. Additional services such as new schools and shopping should be included.</li> <li>3. The quantum of employment land proposed, and the allocations at Park Hall, need to be reappraised.</li> <li>4. There should be a reduced the level of development proposed to better reflect the existing area.</li> <li>5. The Council should encourage applicants on relevant sites to contact relevant water services to consider implications of presence of Vyrnwy Aqueduct under their site.</li> </ol>	<p>Shropshire Council considers that the proposed development strategy for Oswestry and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable. The preferred allocations situated in Park Hall are to address the need for Oswestry town, due to the town's constraints, over the Plan period in conjunction with those allocation from SAMDev. As per the site guidelines, various infrastructure will be required for development to be acceptable and compliant with the emerging plan.</p> <p>The proposed employment land guideline for Oswestry provides appropriate choice and competition within the market, recognises the role of Oswestry and its contribution towards strategic growth objectives in the north-west of the County and meets the needs of the town and its surrounding hinterland, including attracting inward investment and allowing existing businesses to expand.</p> <p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Oswestry and Community Hubs proposed in the Place Plan Area. Additionally, it is important to recognise the diverse nature of Community Hub settlements, and the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlement's characteristics, constraints and opportunities.</p> <p>In identifying proposed site allocations, a comprehensive site assessment process has been undertaken. The Strategic Land Availability Assessment (SLAA) represents the first phase of this site assessment process and represents a very strategic assessment of an individual sites' suitability, availability, and achievability.</p> <p>The evidence base for the LPR includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans. DP19 includes "Development must not adversely affect the quality, quantity and flow of both ground and surface water and must ensure that there is adequate water infrastructure in place to meet its own needs."</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S14.2. Community Hubs: Oswestry Place Plan Area	<ol style="list-style-type: none"> <li>1. Housing guidelines should be made clear that they are not a cap but instead expressed as a minimum</li> <li>2. Numerous representations on the position that allocations are included in Community Hubs.</li> <li>3. Numerous representations on why particular sites are not preferred allocations.</li> <li>4. Representations on the position of Development Boundaries and what is/is not included within these boundaries.</li> <li>5. Numerous representations on the guideline figures, as well as the figures on past completions</li> <li>6. Representations on why some Hubs are allocating more sites than others, and the differing numbers in each of the housing guidelines between Hubs.</li> <li>7. Representations on some of the environmental aspects of an allocation (including, but not limited to water and sewerage), as well as on some of the historic aspects, including Conservation Areas, archaeology.</li> <li>8. Numerous representations on whether certain settlements should qualify for their Hub status, due to their apparent lack of services and facilities which, when read with the Hierarchy of Settlements, means they score too few to qualify as a Hub. Further queries surround the housing guideline for each settlement with Hub status.</li> <li>9. Numerous representations on the lack of regular public transport or significant employment opportunities being unavailable in some settlements with Hub status, and therefore their status should be amended to Countryside.</li> </ol>	<p>The figures illustrated for the sites are only guidelines and so appropriate housing numbers around the figures would be considered at the planning application stage.</p> <p>Shropshire Council considers that the proposed allocations identified to contribute towards achieving the proposed development strategy as appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>Appropriate sites have been selected as the preferred sites for housing allocation in the Oswestry Hubs. Whilst previous stages of the Local Plan Review may have included alternative sites, the current position is considered appropriate by the council. Those sites which have been removed or changed have done so based on the latest information available</p> <p>The Development Boundaries are considered appropriate for each of the Hubs in relation to their built form and areas which are appropriate for development over the plan period.</p> <p>The completions data for the LPR consists of those during the plan period, therefore any figures which pre-date the plan period (i.e. before 31st March 2016) are not included.</p> <p>Each settlement is reviewed on a case-by-case basis, as every settlement has its own respective constraints and opportunities. The housing guidelines for each Hub reflect these and those with Hub status are considered as being suitable settlements for their housing guideline given. With regard to the proposed local housing requirement for Trefonen, it is considered appropriate to review the position having regard to consistency with other similarly scaled community hub settlements, as well as the likelihood of delivery over the plan period, having taken account of the overall net requirement remaining to be delivered over the remainder of the plan period, and that it has not been considered appropriate to allocate any land in the village due to site constraints identified through the SLAA process. It is therefore proposed to include a minor modification to the Plan to reduce the gross housing requirement for the village from 55 to 35 dwellings. It is considered this requirement will be met by: Suitable infill development within the defined development boundary; single plot and larger affordable housing exception schemes, potentially outside the development boundary but on sites well related to the village; and Cross-subsidy exception schemes (at least 70% affordable housing), potentially outside the development boundary but on sites well related to the village</p> <p>Shropshire Council considers its approach as sound, however minor modifications are being put forward where appropriate on aspects such as compliance with water measures and the natural and historic environment</p> <p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to those Community Hubs proposed in the Oswestry Place Plan Area. However, recognising the diverse nature of Community Hub settlements the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlement's characteristics, constraints, and opportunities. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent</p> <p>At no stage has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are the considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.</p>
S14.3. Community Clusters: Oswestry Place Plan Area	N/A	N/A
S14.4. Wider Rural Area: Oswestry Place Plan Area	N/A	N/A
S15. Shifnal Place Plan Area	See S15.1-S15.4	See S15.1-S15.4

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S15.1. Development Strategy: Shifnal Town	<p>1. Safeguarded land proposals are considered to be contrary to the Gunning Principles, case law, national Green Belt policy (demonstrating consideration of reasonable alternatives and exceptional circumstances) and are unsound and the exceptional circumstances for the release of land from the Green Belt should be proven before any Green Belt land is proposed for development.</p> <p>2. Reduction suggested in the level of growth in Shifnal and in particular to reduce the employment guideline figure for Shifnal from 41ha (comprising sites SHF018b and SHF018d) to just 16ha (to comprise SHF018a and P14).</p> <p>3. Reduction suggested to the windfall allowance from the proposed 92 dwellings to a figure between 35 - 50 dwellings and instead continue to safeguard sites SHF015 and SHF029 and move the housing capacity from these proposed housing allocations to the other proposed housing allocations at sites SHF013, SHF022 and SHF023.</p> <p>4. Support recorded for the housing allocations on sites SHF022 and SHF023, the saved housing allocation on site SHIF006 and an intention recorded to attend the proposed Local Plan Examination to support housing allocation SHF015 and SHF029.</p> <p>5. Support recorded for the proposed employment allocation SHF018b and SHF018d but modifications requested to the site development guidelines and a shorter forecast delivery period suggested for this proposed allocation within Appendix 7. These sites need to consider the protection of a public water source within the site boundaries.</p> <p>6. Respondents to the Local Plan suggest that the proposed allocations and safeguarded land to the east of Shifnal should be modified to: to release site SHF018c from the Green Belt at Stanton Road/Coppice Green Lane and safeguard for future development to replace site SHF034 (see below), to release site SHF032 from the Green Belt at Coppice Green Lane and allocate for housing development, to allocate sites SHF018a and P14 for employment development rather than safeguarding the sites, replace the employment allocation (which could be deleted entirely or) on site SHF018b which should instead be safeguarded and remove the safeguarding from site SHF018d which should not be released from the Green Belt.</p> <p>7. Support recorded for the release of site SHF034 at Lodge Hill (comprising SHF019, P15b, P16, SHF017) from the Green Belt but the site is suggested as a housing allocation to provide a Sustainable Urban Extension to Shifnal instead of safeguarding the land for future development.</p> <p>8. Support recorded for the release of site SHF035 at Upton Lane from the Green Belt and to either reserve SHF035 as a housing allocation or safeguard the site for future development to replace site SHF034 which should not be released from the Green Belt or safeguard SHF035 to complement the proposed safeguarded land at site SHF034.</p> <p>9. The physical, social and community infrastructure in Shifnal are considered to be significant constraints on future development which should be addressed before any further development is brought forward in the town. The local highway capacity of the Bradford Street/Aston Street junction is considered to be a significant constraint to the development sites SHF018b and SHF018d and the strategic highway capacity of M54 Junctions 3 and 4 are considered to be significant constraints to further development in Shifnal.</p> <p>10. The Local Plan strategy for Shifnal should be aligned with the currently adopted Neighbourhood Plan for Shifnal.</p>	<p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable, and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings including sites SHF015 &amp; SHF029 that will make an important contribution to meeting the housing needs of Shifnal and helping to conserve the important historical building of Beech House and its curtilage structures and land. These allocations complement the existing committed supply of 370 dwellings which will further complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021 subject to the delivery of the modest windfall allowance for the town. At current rates of development in Shifnal (at 200 dwellings/year) the windfall allowance represents a supply of housing land equal to only a 6 month period. The windfall allowance will allow for smaller developers to enter the market and for development to be delivered that may target the local market and so, it is considered important to sustain this windfall allowance in the draft Local Plan. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic, and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. Development guidelines for sites released for development will ensure the site design, layout, and landscaping respects the character and significance of adjoining land uses. In the Green Belt, this is required to strengthen the boundary to the urban area to help maintain the openness and permanence of the Green Belt around Shifnal. On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038.</p>
S15.2. Community Hubs: Shifnal Place Plan Area	N/A	N/A



Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S15.3. Community Clusters: Shifnal Place Plan Area	N/A	N/A
S15.4. Wider Rural Area: Shifnal Place Plan Area	1. Sites adjoining the built form of Telford proposed to contribute towards achieving the settlement strategy for Shifnal.	<p>Shropshire Council considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>
S16. Shrewsbury Place Plan Area	See S16.1-S16.4	See S16.1-S16.4
S16.1. Development Strategy: Shrewsbury Strategic Centre	<ol style="list-style-type: none"> <li>1. Some support for a higher local housing requirement</li> <li>2. Continued support and cross landowner collaboration for the proposed mixed use SUE between Mytton Oak Road and Hanwood Road</li> <li>3. Some objection to the inclusion of SHR145 and SHR173</li> <li>4. Concern about the level of development at SHR173 (Ellesmere Road)</li> <li>5. Contrary viewpoint expressed regarding the likely delivery timeframe for the proposed North West Relief Road, and thus the delivery trajectory for site SHR173. Proposed removal of SHR173 in favour of land at Berwick Estate.</li> <li>6. Some concern expressed about the Plan's inclusion of the North West Relief Road as this would be incompatible with the aim of carbon reduction</li> <li>7. Further major edge of settlement mixed use site proposed at Nobold, potentially as a reserve site.</li> <li>8. Concern about the proposed allocation of SHR166 in connection with potential heritage impact on the early Roman Marching Camp and on significance on the setting of the Haughmond Hill Scheduled Ancient Monument.</li> <li>9. Proposed inclusion of a new employment site at Battlefield Roundabout for 9 hectares (SHR197) along with concern the employment provision is too low. Conversely, other comments raise concern about the over provision of employment land.</li> <li>10. Too much emphasis placed upon the Big Town Plan as a material planning consideration</li> <li>11. Further policy guidance required in developer guidelines to support provision of new on site play facilities</li> <li>12. More reference should be made to the town's architectural and heritage richness</li> </ol>	<p>Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>It is considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate for both Shropshire and Shrewsbury.</p> <p>The Shrewsbury Big Town Plan is a visionary urban design document which has established a compelling and challenging shared vision and development framework for the town. It is considered appropriate to identify the objectives of the Big Town Plan and its associated masterplan documents as material considerations in decision making as they underpin the proposed strategy for Shrewsbury. We would note that the draft Shropshire Local Plan, if adopted, would represent the starting point for decision making in accordance with Planning law, but that the specific proposals within or resulting from the Big Town Plan would be material in decision making.</p> <p>The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan.</p> <p>References to the North West Relief Road (NWRR) are considered appropriate given the significance of this infrastructure project. However, it is not considered the overall spatial strategy for Shropshire or Shrewsbury is predicated on the specific delivery of the NWRR, with the exception of the delivery of proposed site allocation SHR173.</p> <p>Minor Modifications are proposed to clarify the policy position with regard to the delivery of on-site play facilities and to support additional heritage considerations at the planning application stage for SHR166</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
S16.2. Community Hubs: Shrewsbury Place Plan Area	<p>1. Objections to the level of residential development proposed for various Community Hubs within the Shrewsbury Place Plan Area, including Bayston Hill, Cross Houses, Ford, Hanwood and Longden. Many objections felt the settlement should either not have a proposed residential guideline or that the one proposed was too high (some suggested they should be calculated using a local housing need assessment), whilst others felt it was too low.</p> <p>2. Representations suggested certain residential development guidelines, should be expressed as minimums.</p> <p>3. The proposed methodology (Hierarchy of Settlements Assessment) for identifying Community Hubs is either inappropriate and/or has not been applied consistently.</p> <p>a. Specific settlements identified for removal from the list of proposed Community Hubs including Cross Houses, Ford and Longden.</p> <p>b. Specific settlements identified for addition to the list of proposed Community Hubs, including Westbury (with an associated residential guideline of some 60 dwellings, three residential allocations (WEY006, WEY015 and WEY019) and an appropriate development boundary).</p> <p>4. Need to ensure infrastructure necessary to support development is delivered before any development.</p> <p>5. Need to recognise the significant difference between larger and smaller proposed Community Hubs.</p> <p>6. Need to recognise some settlements have accommodated significant housing development in the past and the associated implications of this development (including traffic).</p> <p>7. Objections to the proposed strategy for achieving proposed residential development guidelines for settlements including Bayston Hill and Hanwood (objections varied but included such factors as reliance on windfall (including implication of proposed development boundaries) and need for reserve sites).</p> <p>8. Objections to specific proposed allocations.</p> <p>9. Sites proposed for allocation in addition/instead of proposed allocations.</p> <p>10. Representations on the proposed capacity and site guidelines for specific allocations.</p> <p>11. Objections to the proposed approach/retention of the Green Gap between Shrewsbury and Bayston Hill.</p> <p>12. Concern over apparent discrepancy regarding site NESS012 - included in the development boundary for Nesscliffe when the Sustainability Appraisal indicates the site is to remain as countryside.</p> <p>13. The development boundary around Ford should be extended to include the cluster of development situated around the junction of Back Lane with the A458.</p> <p>14. Concern that sites previously rejected are considered within the site assessment process.</p>	<p>It is recognised that the settlements across Shropshire are diverse, including where they perform a similar function within the settlement Hierarchy. As such the specific development strategy proposed for each settlement has been informed by consideration of the settlements characteristics, constraints, and opportunities. Shropshire Council considers that the proposed development strategies for each Community Hub within the Shrewsbury Place Plan Area is appropriate, effective, sustainable and deliverable (this includes the existing commitments (including any existing allocations), any proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Identification of proposed site allocations has been informed by a proportionate and robust site assessment process. In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.</p> <p>It is considered that the draft site guidelines for proposed allocations are appropriate and sound.</p> <p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment, used to identify proposed Community Hubs, is appropriate and has been applied consistently across Shropshire. The list of proposed Community Hubs is also considered appropriate.</p> <p>With regard to infrastructure provision, it is important to note that the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements or identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for a site.</p> <p>The retention of the Green Gap between Shrewsbury and Bayston Hill is considered an appropriate policy consideration.</p> <p>Site NESS012 is wholly situated outside the proposed development boundary for Nesscliffe and is proposed to remain in the countryside.</p> <p>The development boundary for Ford was identified in a manner consistent with other rural settlements designated as Community Hubs for policy purpose. It focuses on the village area fronting the A458 Trunk Road and serviced through the But Lane junction with the A458. The development boundary excludes more sensitive areas within the Ford Conservation Area and more isolated and less accessible locations including Back Lane.</p>
S16.3. Community Clusters: Shrewsbury Place Plan Area	<p>1. Uffington should be identified as a proposed Community Cluster.</p>	<p>Shropshire Council considers that the approach used to identify Community Clusters, by which communities can opt-in or opt-out is appropriate and reflects the intended purpose of such Community Clusters - settlements with aspirations to maintain or enhance their sustainability. As such, it is considered appropriate for Uffington to not be identified as a proposed Community Cluster.</p>
S16.4. Wider Rural Area: Shrewsbury Place Plan Area	<p>1. Representations on specific sites at Hanwood Bank.</p>	<p>No allocations are proposed at Hanwood Bank which is proposed to be classified as countryside.</p>
S17. Wem Place Plan Area	<p>See S17.1-S17.4</p>	<p>See S17.1-S17.4</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S17.1. Development Strategy: Wem Key Centre</p>	<ol style="list-style-type: none"> <li>1. The proposed residential guideline should be increased.</li> <li>2. The proposed development boundary should be amended to exclude an area of open land on Mill Street.</li> <li>3. Objections to proposed allocations.</li> <li>4. Concerns about the design of development and importance of matching local character.</li> <li>5. Representations on the proposed capacity and site guidelines for specific allocations.</li> <li>6. Sites proposed for allocation in addition/instead of proposed allocations.</li> </ol>	<p>Shropshire Council considers that the proposed development strategy for Wem and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p> <p>Shropshire Council also considers that the proposed development boundary is appropriate.</p> <p>With regard to the design and layout of development, we would note that a draft Policy (SP5) specifically on high-quality design is proposed within the draft Shropshire Local Plan. Furthermore, draft Policy S11.1 recognises development proposals should positively respond to community-led plans; this includes in relation to design.</p> <p>Shropshire Council considers the proposed capacity of proposed allocations is appropriate. It should be noted that Para 6 of Draft Policy S17.1 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.</p>
<p>S17.2. Community Hubs: Wem Place Plan Area</p>	<ol style="list-style-type: none"> <li>1. Numerous comments on the Hierarchy of settlements for Clive, whereby the settlement does not have enough points to have Hub classification mainly due to the closure of the bowling green and village shop.</li> <li>2. Comments on additional and/or alternative site allocations for Clive, or modifications to the preferred allocation.</li> <li>3. Comments relating to additional sites for Hadnall, either through allocation or within the Development Boundary and increasing the overall housing target for the settlement.</li> <li>4. Comments on the SA scoring sites which have not been allocated higher, and therefore such sites should be included.</li> <li>5. Comments favouring past iterations of the Local Plan, with particular regard to Development Boundaries.</li> <li>6. Queries on Hadnall's housing guideline.</li> <li>7. Amendments were requested in relation to RAF Shawbury and safeguarding zones, as well as military aircraft that may be seen and heard operating in the area and aircraft which could overfly the allocation.</li> <li>8. Comments on further possible sites for Shawbury.</li> </ol>	<ol style="list-style-type: none"> <li>1. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</li> </ol> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints, and opportunities.</p> <ol style="list-style-type: none"> <li>2. Shropshire Council considers that the proposed development strategy for Clive and the proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</li> <li>3. The proposed allocations have been informed by a proportionate and robust site assessment process</li> <li>3. Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement. The Development Boundaries are considered appropriate for each of the Hubs in relation to their built form and areas which are appropriate for development over the plan period. Shropshire Council considers that the</li> </ol>



Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
		<p>proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed development strategy for Hadnall and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable, and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The proposed allocation have been informed by a proportionate and robust site assessment process.</p> <p>4. Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement. The scores outlined in the SA are not the determining factor when deciding on a preferred site for allocation. Rather, it is a combination of many more factors, which includes expertise from those in areas such as Highways, Ecology, Public Protection etc. to ultimately determine the most appropriate site for an allocation.</p> <p>5. The Development Boundaries are considered appropriate for each of the Hubs in relation to their built form and areas which are appropriate for development over the plan period. There have been numerous consultations throughout this Local Plan Review, and amendments have been made between each of these based on the most recent and reliable information available. This can either reinforce Shropshire Council's stance on a site, Development Boundary etc. or ultimately result in changes being made.</p> <p>6. Shropshire Council considers that the proposed development strategy for Hadnall and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable, and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The proposed allocation have been informed by a proportionate and robust site assessment process.</p> <p>7. For clarity of the relationship between RAF Shawbury and Shawbury, a minor modification is proposed to the explanation of this policy.</p> <p>8. Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement.</p>
S17.3. Community Clusters: Wem Place Plan Area	1. Comments relating to Grinshill and that it should be removed as a Community Cluster.	Shropshire Council considers that the approach used to identify Community Clusters, by which communities can opt-in or opt-out is appropriate and reflects the intended purpose of such Community Clusters - settlements with aspirations to maintain or enhance their sustainability. As such, it is considered appropriate for Grinshill to be identified as a proposed Community Cluster.
S17.4. Wider Rural Area: Wem Place Plan Area	N/A	N/A
S18.1. Development Strategy: Whitchurch Place Plan Area	See S18.1-S18.4	See S18.1-S18.4
S18.1. Development Strategy: Whitchurch Principal Centre	<ol style="list-style-type: none"> <li>1. The proposed residential guideline should be increased.</li> <li>2. Objections to the proposed strategy for achieving proposed residential development guidelines for Whitchurch, including reliance on existing allocations and windfall allowance.</li> <li>3. Objections to proposed allocations. Including concerns regarding over-development and flood risk on WHT037 &amp; WHT044 and concerns about infrastructure and highway impact (including pollution) in relation to WHT014.</li> <li>4. Concern regarding the consideration of all sources of flood risk within the site assessment process.</li> <li>5. Need for a hydraulic modelling assessment of the sewerage network.</li> <li>6. Representations on the proposed capacity and site guidelines for specific allocations.</li> <li>7. Sites proposed for allocation in addition/instead of proposed allocations. Suggestions these are more suitable/sustainable than proposed allocations.</li> <li>8. Concern regarding criteria used within the Sustainability Appraisal.</li> </ol>	<p>Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p> <p>The Council considers that the risk of flooding from all sources has been adequately and appropriately assessed through the Strategic Flood Risk Assessments (Stages 1 and 2) and that the Sequential and Exception Tests (based on the SFRA-1 and SFRA-2) are compliant with national planning policy and guidance.</p> <p>The Council expects hydraulic modelling to be carried out by the developer at the planning application stage and assessed through the Development Management process. Information on capacity of the Whitchurch WwTW is welcomed (see also Statement of Common Ground with Dwr Cymru Welsh Water).</p> <p>Shropshire Council also considers that the Sustainability Appraisal (SA) of the draft Shropshire Local Plan is appropriate and robust.</p> <p>Para 6 of Draft Policy S18.1 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that</p>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
		the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage. The draft site guidelines for proposed allocations are also considered appropriate.
S18.2. Community Hubs: Whitchurch Place Plan Area	<ol style="list-style-type: none"> <li>1. Comments relating to scale and design of PPW025.</li> <li>2. Comments relating to an alternative site at PPW021a being allocated instead.</li> <li>3. Comments on PPW021a being omitted in the council's sustainability report which needs to be addressed.</li> <li>4. Comments relating to TIL001 being hatched out in accordance to the approved plan and extended to include sites with planning permission.</li> </ol>	<p>A minor modification is proposed to the 4th paragraph of the draft Site Guidelines for site PPW025 in Schedule 18.2(i) to reflect the need for the design of new development to be comparable in scale and form to adjacent buildings within the Conservation Area, particularly with respect to layout, scale, form and materials and should include a landscape buffer to the heritage assets to the south of the site.</p> <p>Shropshire Council considers that the proposed development strategy for Prees and the existing commitments (including existing allocations), proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>The proposed allocation has been informed by a proportionate and robust site assessment process. This site assessment process included consideration of site PPW021a.</p> <p>Shropshire Council has undertaken a robust Sustainability assessment &amp; site assessment process to inform identification of proposed allocations which included PPW021a at Regulation 18 &amp; 19 stages.</p> <p>TIL001 is an existing allocation within the SAMDev Plan. The draft Policies Map accurately reflects the extent of this existing allocation.</p>
S18.3. Community Clusters: Whitchurch Place Plan Area	N/A	N/A
S18.4. Wider Rural Area: Whitchurch Place Plan Area	N/A	N/A
S19. Strategic Settlement: Clive Barracks, Tern Hill	<ol style="list-style-type: none"> <li>1. Concern expressed about the deliverability and robustness of the delivery trajectory for Clive Barracks, Tern Hill.</li> <li>2. Recognise potential infrastructure implications of the development of Clive Barracks, Tern Hill (including cross-boundary).</li> <li>3. Provide clarity on the future use of the adjacent RAF airfield.</li> <li>4. Reference MOD safeguarding zones within the draft Policy and its explanation.</li> <li>5. Amend site guidelines to: <ol style="list-style-type: none"> <li>a. Provide flexibility to the types of on-site employment generating uses.</li> <li>b. Provide clarity regarding an "appropriate quantity" of Green Infrastructure.</li> <li>c. Provide clarity regarding existing on-site playing fields and the future need for playing fields.</li> </ol> </li> </ol>	<p>Shropshire Council considers that the proposed development strategy for the proposed Clive Barracks, Tern Hill Strategic Settlement is appropriate, effective, sustainable, and deliverable (for a site to be considered deliverable it needs to be suitable, available, and achievable (including viable)). In identifying proposed site allocations, a comprehensive site assessment process has been undertaken.</p> <p>Shropshire Council also considers it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. The draft Shropshire Local Plan presents information on trajectories for the development of these proposed allocations, informed by discussions with and submissions from the relevant site promoters.</p> <p>The proposed Strategic Settlement at Clive Barracks, Tern Hill does not extend onto the adjacent airfield, which it is understood is intending to remain an active RAF airfield.</p> <p>A map illustrating MOD safeguarding zones, as provided by the MOD, forms part of the evidence base for the draft Shropshire Local Plan and forms a consideration within the Planning Application process. The specific approach to the design and layout, dimensions of structures and materials used within any development of Clive Barracks, Tern Hill, to ensure it does not impede operation of the adjacent airfield and associated transmitter/receiver facilities will be determined through the Planning Application process, which can of course be informed by consultation with the MOD. As such it is considered sufficient certainty exists on this matter whilst also recognising the strategic nature of the draft Shropshire Local Plan.</p> <p>The draft Shropshire Local Plan should be read as a whole:</p> <ul style="list-style-type: none"> <li>-Draft Policy DP25 addresses infrastructure provision and applies to all development proposals, including on proposed site allocations. However, for clarity a minor modification is proposed to the explanation of draft Policy DP25 regarding cross-boundary CIL spend.</li> <li>-It is considered that the proposed site guidelines on employment provision, alongside other relevant policies relating to employment provision (including SP12, SP13 and SP14), provide a flexible approach to employment provision on the site, which allows this provision to positively respond to local need, market demands and the aspirations of the Economic Growth Strategy.</li> <li>-It is considered that the proposed site guidelines, alongside other relevant policies on open space and green infrastructure policies (including DP13 and DP15) provide clarity on what is considered an appropriate quantity of green infrastructure provision and the considerations regarding existing and future playing pitch provision. However, specifically in relation to playing pitch provision, a minor modification is proposed to clarify this issue.</li> </ul>

Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
<p>S20. Strategic Settlement: Former Ironbridge Power Station</p>	<ol style="list-style-type: none"> <li>1. Concern expressed about the deliverability and robustness of the delivery trajectory for the Former Ironbridge Power Station.</li> <li>2. Recognise potential infrastructure implications of the development of the Former Ironbridge Power Station (including cross-boundary).</li> <li>3. Relationship between the Former Ironbridge Power Station site and Much Wenlock - particularly impact on infrastructure.</li> <li>4. Representations on the proposed development strategy for Much Wenlock.</li> <li>5. Amend site guidelines to provide clarity regarding existing on-site playing fields and the future need for playing fields.</li> </ol>	<p>Shropshire Council considers that the proposed development strategy for the proposed Former Ironbridge Power Station Strategic Settlement is appropriate, effective, sustainable, and deliverable (for a site to be considered deliverable it needs to be suitable, available, and achievable (including viable)). In identifying proposed site allocations, a comprehensive site assessment process has been undertaken.</p> <p>Shropshire Council also considers it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. The draft Shropshire Local Plan presents information on trajectories for the development of these proposed allocations, informed by discussions with and submissions from the relevant site promoters. Proposed site guidelines for the proposed Former Ironbridge Power Station Strategic Settlement include a requirement to undertake "any necessary improvements to the local and strategic road network...", informed by an appropriate Transport Assessment at the Planning Application stage (site is currently subject to a Planning Application and it is understood a Transport Assessment has been undertaken in support of this application). Furthermore, the draft Shropshire Local Plan should be read as a whole:</p> <ul style="list-style-type: none"> <li>-Draft Policy DP25 addresses infrastructure provision and applies to all development proposals, including on proposed site allocations. However, for clarity a minor modification is proposed to the explanation of draft Policy DP25 regarding cross-boundary CIL spend.</li> <li>-Proposed site guidelines, alongside other relevant policies on open space (including DP15) provide clarity on the considerations regarding existing and future playing pitch provision. However, a minor modification is proposed to clarify this issue.</li> </ul> <p>Representations on the proposed development strategy for Much Wenlock are addressed under draft Policy S13.1.</p>
<p>S21. Strategic Site: RAF Cosford</p>	<ol style="list-style-type: none"> <li>1. RAF Cosford should remain in the Green Belt. Including because Green Belt status and the current policy approach have not prevented the forms of development proposed for the site from taking place and/or there are no exceptional circumstances for removing the site from the Green Belt.</li> <li>2. Concerned Strategic Site status would allow economic development unrelated to military/museum uses proposed and which form the basis for proposed exceptional circumstances.</li> <li>3. The Midland Air Ambulance Charity (MAAC) element of the site should remain in the Green Belt. It now has the benefit of Planning Permission and removal from the Green Belt risks alternative uses occurring.</li> <li>4. The MAAC site is inconsistently referenced within the draft Shropshire Local Plan and its evidence base.</li> <li>5. Impact on the landscape, gap between RAF Cosford and Albrighton and wider Green Belt.</li> <li>6. Comments on specific proposed site guidelines including requirement for a coordinated and complementary approach to development on the site, sustainable drainage, and compensatory improvements to the Green Belt.</li> <li>7. Further land should be added to the RAF Cosford Strategic Site (for residential development to support wider proposals for the site and achievement of the proposed strategic approach for Shropshire).</li> </ol>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council also considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site, including the aspirations of the Midlands Air Ambulance Charity (MAAC). This will of course complement and be complemented by the wider proposals within the draft Shropshire Local Plan.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken. Within this assessment process it is considered that the MAAC is appropriately referenced to reflect its assessment, initially in isolation (within the Strategic Land Availability Assessment) and subsequently as part of a wider potential strategic site (within the assessment of potential strategic sites). The comprehensive site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. The site assessment process also included consideration of landscape/visual amenity and strategic issues such as the relationship to the existing built form. Indeed, the extent of the proposed strategic site has been informed by consideration of the need to maintain an appropriate gap between RAF Cosford and Albrighton.</p> <p>With regard to proposed site guidelines, Shropshire Council considers that:</p> <ul style="list-style-type: none"> <li>-It is important and appropriate for the various components of the RAF Cosford Strategic Site to be coordinated and complementary, which will be achieved through the strategic planning, planning application and masterplanning processes. It is also considered appropriate to expect proactive engagement to occur on masterplans.</li> <li>-It is appropriate to require any new development on the RAF Cosford Strategic Site to incorporate appropriate sustainable drainage and that this is consistent with the requirements of draft Policy DP22.</li> <li>-It is appropriate and consistent with national policy for any new development at RAF Cosford to contribute to opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt. This can effectively be achieved through a coordinated approach led through the strategic planning, planning application and masterplanning processes. To provide certainty that compensatory improvements can be provided, it is considered appropriate to indicate that specific improvements will occur, however this does not necessarily mean that other improvements cannot occur. It is however recognised that any improvements undertaken must not impede operational activities at RAF Cosford, and as such a minor modification on this issue is proposed.</li> </ul>



Policy	Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate	Shropshire Council Response
Appendix 1	1. Comments on proposed saved SAMDev Plan allocations.	These sites are proposed 'saved' allocations, that were allocated within the adopted SAMDev Plan (which was informed by appropriate public consultation, Sustainability Appraisal and Habitats Regulations Assessment. It was then found sound and legally complaint through the Local Plan examination process. Allocations within the adopted SAMDev Plan were also the subject of a comprehensive site assessment process).
Appendix 2	1. Comments on proposed saved SAMDev Plan allocations.	These sites are proposed 'saved' allocations, that were allocated within the adopted SAMDev Plan (which was informed by appropriate public consultation, Sustainability Appraisal and Habitats Regulations Assessment. It was then found sound and legally complaint through the Local Plan examination process. Allocations within the adopted SAMDev Plan were also the subject of a comprehensive site assessment process).
Appendix 3	1. Comments relating to Appendix 3 are addressed in relation to the relevant draft Policy/proposed site allocation.	N/A
Appendix 4	1. Comments relating to Appendix 3 are addressed in relation to the relevant draft Policy/proposed site allocation.	N/A
Appendix 5	1. Comments relating to Appendix 3 are addressed in relation to the relevant draft Policy/proposed site allocation.	N/A
Appendix 6	1. Comments relating to Appendix 3 are addressed in relation to the relevant draft Policy/proposed site allocation.	N/A
Appendix 7	1. Comments relating to Appendix 3 are addressed in relation to the relevant draft Policy/proposed site allocation.	N/A
Habitats Regulations Assessment	<ol style="list-style-type: none"> <li>1. Some responses asked that additional impacts on internationally designated sites or additional species and habitats should be considered.</li> <li>2. The issue of whether there would be sufficient water infrastructure in place to prevent an adverse effect on internationally designated sites was raised.</li> <li>3. Support was received for the assessment of the impacts of development on several internationally designated sites.</li> </ol>	<ol style="list-style-type: none"> <li>1. There needs to be credible evidence of an impact pathway to a European site for it to be subject to screening for likely significant effects. The Council considers that all relevant impact pathways have been identified.</li> <li>2. The Statements of Common Ground between SC and Severn Trent Water and SC and Welsh Water demonstrate that the red and amber constraints for wastewater infrastructure shown in the WCS can be overcome.</li> <li>3. Support is welcomed.</li> </ol>
Sustainability Appraisal	<ol style="list-style-type: none"> <li>1. Several responses requested that the Sustainability Appraisal (SA) score for a site be changed to reflect issues that they considered had either been omitted or incorrectly recorded. Many of these were directed to either adding or removing a proposed site allocation.</li> <li>2. A few respondents commented on the legality of the SA.</li> <li>3. Some respondents queried whether the SA criteria and/or the SA methodology were correct and had been properly applied.</li> <li>4. A number of typographical errors were pointed out.</li> </ol>	<ol style="list-style-type: none"> <li>1. The Council has reviewed all the site scoring issues raised. None of the proposed changes would have a material effect so are not considered necessary.</li> <li>2. Under Sections 19 and 39 of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs). The SA process for Development Plans also incorporates Strategic Environmental Assessment (SEA) in accordance with the requirements of European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (The SEA Directive). The SEA Directive has been transposed into UK law through Statutory Instrument 2004 No 1633: The Environmental Assessment of Plans and Programmes Regulations 2004. The Council considers that it has complied with the requirements of both the Planning and Compulsory Purchase Act 2004 and the Environmental Assessment of Plans and Programmes Regulations 2004.</li> <li>3. The SA Scoping Report set out the proposed criteria and methodology for the SA of the Plan. The Scoping Report was subject to consultation in the early stages of the Plan making process and amendments made as a result. As such, the Council considers the SA criteria and methodology comply with Environmental Assessment of Plans and Programmes Regulations 2004 and have been correctly applied.</li> <li>4. Errors have been noted.</li> </ol>

# **Shropshire Local Plan Review**

**Schedule 2: High-level summary of  
the duly-made representations  
received**

1	2	3	4	5	6	7	8
Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0001	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Development Strategy: Shifnal Town	Not Specified	Not Specified	Not Specified	Object to allocation of SHF015 & SHF029 for ecological issues. Site guidelines do not reflect the nature of the sites.
A0002	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Shrewsbury Hubs: Longden	Not Specified	No	Not Specified	Disagree with Hierarchy of Settlements as applied to Longden. Disagree with sites which have been included despite appeals on these sites being rejected (016 & 022).
A0003	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Shrewsbury Hubs: Longden	Not Specified	No	Not Specified	Disagree with Hierarchy of Settlements as applied to Longden. Disagree with sites which have been included despite appeals on these sites being rejected (016 & 022).
A0004	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP28	Yes	No	Yes	The canal network between Shrewsbury, Uffington, Upton Magna and Withington should be restored.
A0005	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP19	Not Specified	No	No	Assurances should be sought from the appropriate utilities that the infrastructure will be sufficient to support any developments , together with any necessary funding obtained from both the utilities and developers prior to any development being considered. Any infrastructure changes of additions should be in place prior to further development, not after.
A0005	B002	Sustainability Appraisal	S18. Whitchurch	Not Specified	No	Not Specified	1.Two doctors surgeries have already closed, the primary school is at full capacity and expansion has been repeatedly delayed. 2.Public transport serving Whitchurch has continued to decline over the last several years, with reduced services and reliability. There are no published plans to improve public transport, both rail and bus services continue to be reduced. 3. With reference to “existing access to health, leisure, recreational and cultural activities.” - as stated above ‘health care’ is already stretched with access to hospitals and emergency services severely compromised following the closure of the ambulance station and paramedic capacity compromised: leisure and recreational activities limited (in particular for young people with the decrease in youth provision) and cultural activities few and far between e.g. the nearest cinema is 12 miles (Wrexham). Therefore, the statement “this level of growth is likely to minimise the need for additional car-based transport” is misleading.
A0005	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18	Not Specified	No	Not Specified	Section from the Shropshire Landscape Visual Sensitivity Study referenced in the local plan has contradictory statements and makes no reference to the visual impact of existing properties adjacent to or overlooking the proposed development. “Views from dispersed individual properties and farmsteads and recreational users of the PRoW network are typically highly susceptible to changes to their surroundings “. Contradicted by Summary: “The potential to accommodate new development within the parcel with appropriate mitigation, combined with the type of receptors present, means views experienced are of medium sensitivity to change arising from new housing “



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0001	B001	1&2. Removal of site allocation SHF015 & SHF029.	The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings including sites SHF015 & SHF029 that will make an important contribution to meeting the housing needs of Shifnal and helping to conserve the important historical building of Beech House and its curtilage structures and land. In identifying the proposed site allocations including SHF015 and SHF029, a comprehensive site assessment process has been undertaken, which included consideration of ecological issues. As such no change is proposed.	No
A0002	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden. As such it is considered appropriate for Longden to be identified as a proposed Community Hub. However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach. In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.	No
A0003	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden. As such it is considered appropriate for Longden to be identified as a proposed Community Hub. However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach. In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.	No
A0004	B001	Modify DP28(3)(b) and para 4.253 to include the objective "To undertake the complete restoration of the Shrewsbury Canal to its original terminus at the Butter Market."	Shropshire Council recognises in Policy DP28 that the canal network provides a local travel option in communities with access to the network and for visitors and tourists in the County. Policy DP28 encourages this use of the canal network to influence individual travel choices and to reduce the cumulative impacts of travel and transport on the environment. Policy DP28 also encourages the protection and enhancement of the canal network to sustain these important local travel routes within and through the County. These aims are strengthened by their inclusion in Policy DP28 as part of the objectives for managing the scale and pattern of development in the Local Plan strategy to 2038. A modification to Policy DP28 promoting the complete restoration of the Shrewsbury Canal along its route to Newport, would not further strengthen the Council's policy objectives because there is no approved and costed scheme to completely restore this Canal. The objectives of Policy DP28 do support localised works to the Shrewsbury Canal and other canal routes and encourages the long term objective of sustaining the canal network for community use and for tourism and leisure.	No
A0005	B001	Assurances should be sought from the appropriate utilities that the infrastructure will be sufficient to support any developments , together with any necessary funding obtained from both the utilities and developers prior to any development being considered. Any infrastructure changes of additions should be in place prior to further development, not after.	The Council's Statements of Common Ground with Severn Trent Water and Dwr Cymru Welsh Water show that the water infrastructure requirements identified in the Councils Water Cycle Study can be delivered.	No
A0005	B002	The statements in the review indicating that this situation is likely to be maintained or improved should be clarified and changed to reflect the correct situation regarding these important areas which are indicated as highly likely to continue to degrade. It is also highly likely that car based transport will increase in line with further developments and not be 'minimised' to any degree as stated.	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP28 addresses transport.	No
A0005	B003	These contradictions should be investigated and clarified, with reference made to the impact on adjacent properties. There is also no reference to the loss of green space and associated wildlife corridor this area currently affords, or the additional traffic that would be created on an already highly congested local road network.	The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that as such, the proposed amendments are not necessary. No change proposed.	No

1	2	3	4	5	6	7	8
Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0006	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	No	No	No	Much Wenlock Neighbourhood Plan ignored - SC have failed to offer any meaningful direct consult the community on an important topic such as the designation of the main route through Much Wenlock (including the conservation area) The A458 and the A4169 into a commercial strategic corridor to support economic growth within the county.
A0007	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Shrewsbury Hubs: Longden	Not Specified	No	Not Specified	<p>Longden should not be a Hub - it is a small and old village, smaller than all other Hubs and has limited road infrastructure. Development in the village will result in loss of trees and hedgerows and highly valued agricultural fields. Local surveys, community engagement, the Village Development Statement (appendix of this representation) and consultation responses are clear the community does not support Community Hub status, this status is therefore in breach of Localism.</p> <p>The Hierarchy of Settlements is flawed as it fails to weigh services based on size and capacity to cater for more residents. Longden has only a mobile library, a small joint shop/post office, small pub, small school and small nursery, but all attain the same points as larger facilities. Superfast broadband is not available, the Council indicate satellite links, but surely this is available to everyone. Outdoor sports facilities and children's playground should be grouped together. Whilst there is a regular bus service it is not sufficiently frequent to have a major impact on sustainability and does not link to services to settlements beyond Shrewsbury. there are few employment opportunities in the Parish, with most commuting to Shrewsbury and beyond.</p> <p>Consider the proposed residential guideline is too high and disregards evidence about housing need and local views.</p> <p>Development in Longden, without access to adequate public transport and no local employment would generate significant additional carbon, encourage more cars and contradicts national and local zero carbon strategies.</p> <p>Unclear why sites which have been subject to refused appeals are considered.</p> <p>Infrastructure plan and transport plan missing.</p> <p>Covid 19 restrictions have reduced the ability to raise community awareness/undertake community engagement on this consultation.</p>
A0008	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	Object to the intention to deliver 'around 30,800 dwellings'. Whilst consistent with the adopted Core Strategy it is no longer so with national policy. Also disagree with vagueness in para 2 with the 'around' figure.
A0008	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S1: Albrighton	Not Specified	No	Not Specified	<p>Object to Albrighton Development Boundary, which restricts development opportunities. It should be amended to include ALB023.</p> <p>Query deliverability of adopted SAMDev Plan allocation ALB003.</p> <p>ALB023 should be taken out of the Green Belt and allocated for development to contribute to achieving the proposed development guideline for Albrighton (complementary to or instead of ALB003). The site is more suitable and sustainable than proposed safeguarded land to the east, benefits from good access to services and would 'round off the settlement'. Whilst ALB023 is located within a conservation area, it can be sensitively designed to enhance character and appearance. Three potential access points existing for the site, all suitable to serve the development.</p> <p>Disagree with the conclusions of the 2018 Green Belt Review regarding the contribution ALB023 makes to Green Belt purposes, rather consider it makes no/weak contributions.</p> <p>Also disagree with the conclusions relating to proposed safeguarded land.</p> <p>Disagree with the proposed safeguarded land and concerned about their availability and suitability. As a result also concerned about the permeance of proposed Green Belt boundaries.</p>
A0009	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.1 Wem	Not Specified	Not Specified	Not Specified	WEM033 could accommodate 84 dwellings rather than the 60 dwelling guideline.

1	2	9	10	11
Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0006	B001	SC need to carry out its own traffic assessments and consult with those within the town whose concern would not be just the increase in traffic along the route but the congestion caused at the Gaskell corner with dangerous pedestrian crossing points. SC are relying on an inadequate assessment by the developers of Ironbridge Power Station. There has been absolutely no consultation on this point.	The A458 between Shrewsbury and Bridgnorth and leading on to connect with the Black Country is undoubtedly a strategic corridor through Shropshire as part of the principal road network. The town of Much Wenlock would also appear to support this designation lying on the junction of the A458 with the A4169 linking to Ironbridge and the redevelopment of the site of the former power station, and with Telford, Shifnal on to the M54 corridor principally through Junction 4. Nevertheless, SP14 does require consideration of the sequential preference for development in criterion 3 and the need to consider the sustainability of development proposals and their proposed location in criterion 4. It is considered that the matters raised in relation to the suitability of Much Wenlock to perform as a location for development on the A458 strategic corridor are addressed in SP14 which is considered to be consistent, sufficiently flexible and positively contribute to the achievement of the Local Plan strategy.	No
A0007	B001	Revisit the Hierarchy of Settlements assessment and allocate Longden Village as a Community Cluster rather than a Community Hub.	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p> <p>In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No
A0008	B001	Amend the housing requirement and use of the word around.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.	No
A0008	B002	Harp Land site should be removed from the Green Belt and allocated for development. Inclusion of adopted SAMDev Plan allocation ALB003 and proposed safeguarded land should be reconsidered.	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a proportionate and robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Shropshire Council considers that the Green Belt Assessment and Green Belt Review undertaken to inform the draft Shropshire Local Plan are appropriate and robust assessments.</p> <p>Shropshire Council also considers the proposed development boundary for the settlement to be appropriate and reflects the extent of Green Belt and built form.</p>	No
A0009	B001	Increase site guideline from WEM033 to 84 dwellings.	Shropshire Council considers the proposed capacity of WEM033 is appropriate. It should be noted that Para 6 of Draft Policy S17.1 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0010	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Not Specified	No	Not Specified	Clive should not be identified as a Community Hub as two services/facilities identified within the Hierarchy of Settlements Assessment are no longer presented. Specifically the bowling green is located within a private garden (and has been for 2 years) and the village shop has now closed (October 2020) and the owner has confirmed it will not be re-opening. Taking these out would lower its score to 47, meaning Clive would no longer exceed the threshold for Community hub status. The post office operates only 2-4 hours a week and as such does not warrant significant points for this service.
A0011	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	No	No	No	Clive should not be a Hub as some of its services are no longer available (bowling green is closed and shop closed in Oct 2020).

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0010	B001	Update the Hierarchy of Settlements Assessment to remove the points attributed to Clive for the bowling green and village shop. This results in the settlements score dropping below Community Hub status. Remove Community Hub status from the settlement within the draft Shropshire Local Plan.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0011	B001	Remove the bowling green and village shop from the scoring, which would result in a score of 47, therefore giving Clive Cluster Status.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0012	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Not Specified	No	Not Specified	Outdated information used to determine Clive's status as a Hub - it should be a Cluster. Infrastructure cannot cope with new development, particularly roads.
A0013	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Not Specified	No	Not Specified	The information used to establish Clive's Community Hub status within the Hierarchy of Settlements Assessment is outdated. The facilities currently available are not sufficient to achieve the threshold identified within the assessment. Infrastructure within the village cannot cope with new development, particularly the roads (narrow, sharp bents and subject to flooding). The community does not want further large scale development.
A0014	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.20	Not Specified	Not Specified	Not Specified	No reference to Local Nature Recovery Strategy. Concerned about absence of up to date and adopted Local Transport Plan.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0012	B001	Remove Hub Status	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0013	B001	Update the Hierarchy of Settlements Assessment to remove the points attributed to Clive for the bowling green and village shop. This results in the settlements score dropping below Community Hub status. Remove Community Hub status from the settlement within the draft Shropshire Local Plan.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0014	B001	Make reference to Local Nature Recovery Strategy. Prepare and adopt a Local Transport Plan.	<p>Noted. Documents listed in Para 2.20 is not intended to represent an exhaustive list, rather it highlights the fact that the draft Shropshire Local Plan has not been prepared in isolation. Future Nature Recovery Strategy is specifically referenced within draft Policy DP12.</p> <p>The draft Shropshire Local Plan has been informed by an extensive evidence base and discussions with relevant service areas, including colleagues in Highways particularly in relation to proposed site allocations. Shropshire Council is preparing the next Local Transport Plan (LTP4).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0014	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.21	Not Specified	Not Specified	Not Specified	Welcome recognition of need to respond to Climate Emergency and aim to achieve sustainable development. There is an Ecological and Climate Emergency, weighting should be duly considered in the 'full balance of considerations'.
A0014	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	Not Specified	Not Specified	Not Specified	Due to the Ecological and Climate Emergency we should be moving towards a zero carbon economy now, the vision should be about seeking to complete this transition.
A0014	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (2)	Not Specified	Not Specified	Not Specified	Reference forthcoming Nature Recovery Strategy and Climate Strategy.
A0014	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2(2)	Not Specified	Not Specified	Not Specified	Concerned scale of residential and employment development proposed is too high, exceeds local housing need and is not a sustainable approach. It focuses on economic growth rather than pursuing the three pillars of sustainable development (economic, social and environmental) in a mutually supportive way. Concerns filter down to the various proposals for Place Plan Areas / Sites.
A0014	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2(5b)	Not Specified	Not Specified	Not Specified	Para 5b of draft Policy SP2. Not all Principal and Key Centres are equal in their ability to accommodate sustainable growth.
A0014	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 3.17	Not Specified	Not Specified	Not Specified	The purpose of the local plan is surely to achieve sustainable development not to achieve the aspirations of the Economic Growth Strategy.
A0014	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 3.28(b)	Not Specified	Not Specified	Not Specified	Question the ability of the A5 West strategic corridor to deliver true sustainable economic growth
A0014	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 3.28(d)	Not Specified	Not Specified	Not Specified	Oppose HS2 at the national level as environmental costs outweigh benefits. Identification of a strategic corridor (North East Shropshire and the A41 corridor - which is solely a road transport corridor) linked to HS2 is an example of the unsustainable results of the scheme and such reference is unwelcome.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0014	B002	Apply appropriate weighting to the Ecological and Climate Emergency.	Where decisions on land allocations have been taken, they have been done so having regard to a full balance of considerations, with the aim of achieving sustainable development.	No
A0014	B003	Reword along the following lines: 'as Shropshire moves towards completing its progress to a zero-carbon economy'.	Noted. The draft Spatial Vision recognises the importance of and identifies the need to move positively towards a zero-carbon economy. The draft Spatial Vision would be implemented through the draft Policies proposed within the draft Shropshire Local Plan. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the draft Shropshire Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0014	B004	Include reference to forthcoming Nature Recovery Strategy and Climate Strategy.	Noted. Documents listed in Para 2 of draft Policy SP1 are not intended to represent an exhaustive list, rather it highlights that, where appropriate, proposals need to reflect relevant considerations from other Shropshire Council strategies. The draft Shropshire Local Plan includes policies relating to the natural environment (including DP12. Natural Environment; DP14. Green Infrastructure; DP15. Open Space and Recreation; DP16. Landscaping of New Development and DP17. Landscape and Visual Amenity) and managing climate change (including SP3. Climate Change; DP11. Minimising Carbon Emissions; DP21. Flood Risk). Future Nature Recovery Strategy is specifically referenced within draft Policy DP12. The Natural Environment. The Climate Change Strategy Framework approved by Shropshire Council on the 19th December 2019 is specifically referenced within the Explanation of draft Policy SP3. Climate Change.	No
A0014	B005	Reduce level of residential and employment development proposed.	Concern noted. At the heart of the draft Shropshire Local Plan is the achievement of sustainable development. It is considered that the proposals within the draft Shropshire Local Plan, including in relation to the level of housing and employment development, will contribute to the long term sustainability of Shropshire.	No
A0014	B006	Recognise that not all Principal and Key Centres are equal in their ability to accommodate sustainable growth.	Agreed. Draft Policy SP2 is not intending to suggest that all Principal and Key Centres are equal, but recognises that settlements within each category perform similar roles, as foci for key services and facilities, supporting their and surrounding communities. The draft policy recognises that these settlements are 'diverse' and the specific strategies for these settlements (identified within Policies S1-S18) are predicated on consideration of the characteristics, constraints and opportunities associated with each settlement.	No
A0014	B007	Reduce focus on achieving the Shropshire Economic Growth Strategy.	The draft Shropshire Local Plan seeks to achieve the sustainable development of Shropshire. However, the Local Plan does not sit in isolation; it is supported by and has regard to a number of other strategies produced by the Council and other bodies, including the Economic Growth Strategy for Shropshire. The draft Shropshire Local Plan seeks to respond effectively to these strategies. However in doing so, it should not be categorised as having any one overarching theme. Instead the draft Shropshire Local Plan provides a broad basis for dealing with a number of challenges in a balanced and positive manner.	No
A0014	B008	Remove reference to the A5 West corridor from para 3.28(b).	The draft Shropshire Local Plan is supported by and has regard to a number of other strategies produced by the Council and other bodies, including the Economic Growth Strategy for Shropshire. The Economic Growth Strategy for Shropshire identifies a series of strategic corridors, which are considered the principal rail and/or strategic road routes through the County, which it identifies as the primary focus for major employment development. One such corridor is the A5 West corridor, upon which Oswestry, the largest Principal Centre and second largest settlement is located. The draft Shropshire Local Plan seeks to prioritise significant new development and infrastructure investment into the Strategic, Principal and Key Centres and identified Strategic Sites to create 'growth zones' along the identified 'strategic corridors' through Shropshire and make effective use of the rail and road routes through these corridors. This is considered a sustainable approach to the development of Shropshire.	No
A0014	B009	Remove reference to HS2 from para 3.28(d). Remove reference to the North East Shropshire and the A41 corridor from para 3.28(d).	The draft Shropshire Local Plan is supported by and has regard to a number of other strategies produced by the Council and other bodies, including the Economic Growth Strategy for Shropshire and Government proposals for formation of HS2. Proposals such as HS2 cannot be ignored and would represent an economic opportunity for Shropshire, although it is important to note that none of the proposals in the draft Shropshire Local Plan are dependent on the delivery of this project. The Economic Growth Strategy for Shropshire identifies a series of strategic corridors, which are considered the principal rail and/or strategic road routes through the County, which it identifies as the primary focus for major employment development. One such corridor is the North East Shropshire and the A41 corridor, upon which Whitchurch and Market Drayton are located, both of which are considered Principal Centres within the Shropshire Local Plan. The draft Shropshire Local Plan seeks to prioritise significant new development and infrastructure investment into the Strategic, Principal and Key Centres and identified Strategic Sites to create 'growth zones' along the identified 'strategic corridors' through Shropshire and make effective use of the rail and road routes through these corridors. This is considered a sustainable approach to the development of Shropshire.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0014	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 3.28(e)	Not Specified	Not Specified	Not Specified	Question the ability of the A49 strategic corridor to deliver true sustainable economic growth.
A0014	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Not Specified	Not Specified	Not Specified	Welcome inclusion of a specific Climate Change policy. However, consider it needs to be much stronger. For example, "Climate Emergency" would be a better policy title reflecting Shropshire Council's declaration.
A0014	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3(1e)	Not Specified	Not Specified	Not Specified	In para 1e, amend encourage to ensure.
A0014	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3(1f)	Not Specified	Not Specified	Not Specified	In para 1f, wording is weak as electric charging infrastructure should be provided in all new development.
A0014	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3(2a)	Not Specified	Not Specified	Not Specified	In para 2a, more clarity is needed on what is meant by renewable and low carbon energy systems.
A0014	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3(3a)	Not Specified	Not Specified	Not Specified	In para 3a, wording is weak. There should be more than 'encouragement'.
A0014	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3(3b)	Not Specified	Not Specified	Not Specified	In para 3b, there should be a requirement to restore habitats with potential for significant carbon sequestration and storage, including wetlands, peatland, and soils.
A0014	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3(4c)	Not Specified	Not Specified	Not Specified	In para 4c, "supporting" should be replaced with "requiring", as per Biodiversity Net Gain as a minimum.
A0014	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	Not Specified	Not Specified	Not Specified	This is not a robust interpretation of the NPPF definition of sustainable development: "development which meets the needs of the present without compromising the ability of future generations to meet their own needs". Throughout the plan the term "sustainable" is used without adequate consideration of environmental implications. This is also true for the sustainability appraisal.
A0014	B019	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Not Specified	Not Specified	Not Specified	Policy could be strengthened by including: "should be designed to integrate space for both people and wildlife, reduce carbon emissions and minimise water usage". High quality design should not compromise sustainability and should incorporate extensive sustainable design features beyond solar.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0014	B010	Remove reference to the A49 corridor from para 3.28(e).	The draft Shropshire Local Plan is supported by and has regard to a number of other strategies produced by the Council and other bodies, including the Economic Growth Strategy for Shropshire. The Economic Growth Strategy for Shropshire identifies a series of strategic corridors, which are considered the principal rail and/or strategic road routes through the County, which it identifies as the primary focus for major employment development. One such corridor is the A49 corridor, upon which Ludlow, a Principal Centre is located. The draft Shropshire Local Plan seeks to prioritise significant new development and infrastructure investment into the Strategic, Principal and Key Centres and identified Strategic Sites to create 'growth zones' along the identified 'strategic corridors' through Shropshire and make effective use of the rail and road routes through these corridors. This is considered a sustainable approach to the development of Shropshire.	No
A0014	B011	Amend name of draft Policy SP3 to Climate Emergency.	The name of draft Policy SP3 is considered to appropriately reflect its subject matter.	No
A0014	B012	In para 1e of draft Policy SP3, amend encourage to ensure.	The proposed change would impose an unreasonable requirement given that the rural nature of Shropshire means that not all new development will be able to link to or integrate with public transport.	No
A0014	B013	In para 1f of draft Policy SP3, amend wording to require electric charging infrastructure in all new development.	It is considered that the current wording is appropriate. The provision of electric vehicle infrastructure is covered by Building Regulations rather than the planning regime. No change proposed.	No
A0014	B014	Provide clarification of renewable and low carbon energy systems within para 2a of draft Policy SP3.	Noted. The Annex 2: Glossary of the NPPF provides a useful summary of these terms. Further details of requirements relating to renewable energy and low carbon energy requirements is available within draft Policy DP11. Minimising Carbon Emissions.	No
A0014	B015	Strengthen requirements of para 3a of draft Policy SP3.	The Council considers that the current wording is consistent with current national policy. No change proposed.	No
A0014	B016	In para 3b of draft Policy SP3, require restoration of habitats with potential for significant carbon sequestration and storage.	The draft Shropshire Local Plan identifies a vision and framework for the future development of Shropshire to 2038, however it does not and cannot manage all existing land uses. Therefore whilst it can positively promote/encourage opportunities to restore wetlands as part of the development process, it cannot require their restoration. No change proposed.	No
A0014	B017	In para 4c of draft Policy SP3, amend wording to require an increase in the extent, interconnectedness and diversity of wildlife habitats and the ecosystem services which they provide.	The concept of biodiversity net gain is already captured in draft Policy DP12. The Natural Environment. Para 4c of draft Policy SP3 sets the context for this policy requirement. No change proposed.	No
A0014	B018	Reflect the definition of sustainable development provided within the NPPF within draft Policy SP4.	The draft Shropshire Local Plan seeks to achieve the sustainable development of Shropshire. All references to sustainable development within the draft Shropshire Local Plan recognise the three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). This is recognised within the introduction to the draft Shropshire Local Plan, which states "the pursuit of sustainable development is at the heart of the planning process" and that "achieving sustainable development will mean that decision takers must look at all facets of sustainability in arriving at decisions: economic, social and environmental. In all cases a balance of considerations is needed, and it is accepted this will often lead to a variety of opinions being expressed." The proposals within the draft Shropshire Local Plan have been informed by a comprehensive Sustainability Appraisal process. Draft Policy SP4 is not seeking to define sustainable development, rather it is providing clarity on how the presumption in favour of sustainable development introduced within the NPPF would apply, if relevant, in Shropshire.	No
A0014	B019	Include the following policy requirement "should be designed to integrate space for both people and wildlife, reduce carbon emissions and minimise water usage" within draft Policy SP5.	Noted. Draft Policy SP5 already states "Design and layout positively responds to our changing climate by taking opportunities to maximise energy efficiency (including maximising opportunities for solar gain), minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan". Furthermore the draft Shropshire Local Plan should be read as a whole and wider draft policies also address these issues. For instance draft Policies SP3 and DP11 address climate change and minimising carbon emissions; draft Policy SP6 addresses health and wellbeing, including consideration of "the provision of appropriate levels of private and public open space"; draft Policy DP15 addresses provision of open space within development; draft Policies DP14 and DP16 address green infrastructure and landscaping of new development respectively; and draft Policy DP20 addresses water efficiency.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0014	B020	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Not Specified	Not Specified	Not Specified	Welcome this draft Policy.
A0014	B021	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6(2)	Not Specified	Not Specified	Not Specified	It is well-established that access to natural greenspace is beneficial for health and well-being. Feel high quality accessible greenspace should be included in 'external space standards'.
A0014	B022	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6(7)	Not Specified	Not Specified	Not Specified	Weak wording. Walking and cycling routes and infrastructure should be provided in development. Accessible natural greenspace should be specifically referenced and a definition of walking distance provided e.g. NE Access to Natural Greenspace standard.
A0014	B023	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6(5b)	Not Specified	Not Specified	Not Specified	A hierarchy of action is required, with 'enhance' as a high priority. Need to recognise value of 'natural play' and the need to enhance, retain and protect areas where this can occur.
A0014	B024	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6(7)	Not Specified	Not Specified	Not Specified	Should include promotion of local food supply (allotments/garden space/farmers markets).
A0014	B025	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6(8)	Not Specified	Not Specified	Not Specified	Focus should be on nature-based solutions, i.e. tree planting, to achieve this.
A0014	B026	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10(5b)	Not Specified	Not Specified	Not Specified	Improved digital connectivity can reduce need for additional infrastructure and travel.
A0014	B027	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	Not Specified	Not Specified	Concerned about loss of Green Belt. Consider it is unacceptable to develop (or safeguard) land where its release from the Green Belt would cause a moderate or above risk of harm.
A0014	B028	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11(3b)	Not Specified	Not Specified	Not Specified	Para 3b should be removed. The draft Policy should explicitly state that no Green Belt should be released if this would cause a moderate or above risk of harm.
A0014	B029	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 3.108	Not Specified	Not Specified	Not Specified	Mitigation of land removed from the Green Belt should follow Biodiversity Net Gain principles.
A0014	B030	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13 and Para 3.134	Not Specified	Not Specified	Not Specified	The sentence is contradictory. It states development should "respond positively" but then refers to environmental assets as "constraints". Further definition on the meaning of a 'positive response' is needed. This should include as a minimum actively enhancing biodiversity, as required by the NPPF, and supported by the Nature Recovery Strategy and Biodiversity Net Gain.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0014	B020	N/A	Support welcomed.	No
A0014	B021	Make reference to high quality accessible greenspace as part of 'external space standards' within para 2 of draft Policy SP6.	Para 2 of draft Policy SP6 recognises the need for provision of appropriate levels of private and public open space, including accessible greenspace, as part of 'external space standards'. Draft Policy DP15 provides further detail of open space requirements for development.	No
A0014	B022	1. Para 7 of draft Policy SP6 should require walking and cycling infrastructure to be provided. 2. Para 7 of draft Policy SP6 should reference accessible natural greenspace and provide a definition of walking distance.	1. The Council considers the wording of Para 7 of draft Policy SP6 is appropriate, it promotes provision of safe and well-lit high-quality walking and cycling routes, cycle parking, changing facilities and secure lockers.... This approach recognises the diverse nature of Shropshire and development proposals that come forward. 2. Para 7 of draft Policy SP6 references development being within walking distance of open space, this includes accessible natural greenspace.	No
A0014	B023	1. Para 5b of draft Policy SP6 should include a hierarchy of action for sports, leisure, recreation and education facilities including children's playgrounds. 'Enhance' should be the highest priority. 2. Para 5b of draft Policy SP6 should recognise the value of 'natural play' and the need to enhance, retain and protect areas where this can occur.	1. Para 5b of draft Policy SP6 recognises the importance of protecting, retaining or enhancing sports, leisure, recreation and education facilities including children's playgrounds. The specific opportunities vary from site to site, but the draft policy already includes recognition of the importance of enhancing these facilities. 2. Consideration of the various forms of open space, including space for 'natural play' is captured within this draft Policy and draft Policy DP15. Open Space and Recreation.	No
A0014	B024	Include promotion of local food supply (allotments/garden space/farmers markets) in para 7 of draft Policy SP6.	This draft policy (alongside other draft policies such as DP15, Open Space and Recreation) already recognises the importance of providing appropriate external space standards, including the provision of appropriate levels of private and public open space - this will include allotments and garden space.	No
A0014	B025	Para 8 of draft Policy SP6 should focus on nature-based solutions, i.e. tree planting, to achieve protection against pollution.	The purpose of para 8 of draft Policy SP6 is to identify the policy considerations in relation to the role of new development in ensuring the health and well-being of individuals, communities and places. In this context, an important consideration is protecting against exposure to pollution and it is agreed that green infrastructure (including tree planting) is an important way within which this can be achieved. However this is a high level strategic policy and cannot provide detail on all methods of protecting against exposure to pollution. However, it is directly supported by a more detailed policy on this issue, specifically draft Policy DP18. Pollution and Public Amenity. Para 3 of this draft Policy includes "Opportunities to improve air quality through the provision of green infrastructure in accordance with Policy DP14..."	No
A0014	B026	N/A	Comment is noted. It is identified as relating to para 5b of draft Policy SP10, however it appears to relate to para 5b of draft Policy SP12 (SP12 was referenced as SP10 within the earlier consultation on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan).	No
A0014	B027	Sites identified for development or safeguarding that would result in moderate or above harm to the Green Belt should be removed from the draft Shropshire Local Plan.	Noted. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No
A0014	B028	Delete paragraph 3b of draft Policy SP11 and replace it with a statement that no Green Belt should be released if this would cause a moderate or above risk of harm.	Noted. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Harm of release is a significant consideration, but other factors must also be taken into account as described in the Policy explanatory text.	No
A0014	B029	Amend para 3.108 to stipulate that land removed from the Green Belt should follow biodiversity net gain principles.	Noted. Achieving biodiversity net gain is already captured in draft Policy DP12. The Natural Environment, as such it would apply to development of any site, including those which were removed from the Green Belt for development.	No
A0014	B030	1. Amend para 3.134 to amend reference to environmental constraints. 2. Amend para 3.134 to further define the meaning of a 'positive response' to environmental 'constraints'.	The reference to "environmental constraints" in paragraph 3.134 of the Explanation to Policy SP13 does not imply any judgements on the significance and benefits of any environmental considerations to be addressed in the development of employment land. The guidance in the policy seeks to ensure that whilst these environmental considerations might have the effect of reducing the developable area of the site, any reduction in the developable area and any consequent treatment of environmentally sensitive areas, will make a positive contribution to the quality and utility of the proposed employment development.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0014	B031	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Not Specified	Not Specified	Not Specified	There should be explicit preference for rail connectivity. Too much weight is afforded to road corridors. See comment for draft Policy DP9.
A0014	B032	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14(2)	Not Specified	Not Specified	Not Specified	Wildlife sites are effected more by transport than just 'atmospheric emissions', i.e. run-off and pollutants. These negative impacts needs to be considered, prevent, reduced, and mitigated for.
A0014	B033	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14(4a)	Not Specified	Not Specified	Not Specified	To achieve a 'sustainable pattern of development', balance is needed between delivery of housing, employment and environmental growth. It is not sustainable if the environment is not considered on an equal footing to the other two issues.
A0014	B034	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 3.142	Not Specified	Not Specified	Not Specified	Question the ability for A5 West, A41 and A49 corridors to provide true sustainable growth. Oppose HS2 at a national level as the environmental costs outweigh any benefits.
A0014	B035	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 3.144	Not Specified	Not Specified	Not Specified	Refers to 'environment constraints'. These are not constraints, but assets, and should not be referred to in this negative connotation. Dubious about inclusion of reference to development being supported under 'very special circumstances'.
A0014	B036	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	Not Specified	Not Specified	Not Specified	What constitutes an 'Estate'; how small or large an enterprise? 'Estates' have great potential to contribute to Nature Recovery Networks and so there should be reference to the forthcoming Nature Recovery Strategy.
A0014	B037	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 3.159	Not Specified	Not Specified	Not Specified	Restoration and aftercare of mineral sites should follow Biodiversity Net Gain principles as a minimum.
A0014	B038	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP17 and Para 3.161	Not Specified	Not Specified	Not Specified	Welcome reference to Government's 25 Year Environment Plan, but there should be greater reference to this throughout the document, especially in relation to Policies SP3, SP4, and SP9.
A0014	B039	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 3.164	Not Specified	Not Specified	Not Specified	Policies should encourage and enable reduction of waste akin to the waste management hierarchy. This policy seems to accommodate 'inevitable' increase in waste.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0014	B031	Draft Policy SP14 should include an explicit preference for rail connectivity.	Policy SP14 places an emphasis on rail connections in the opening statement to the Policy and in criteria 1 and 3 and paragraphs 3.141 and 3.150. SP14 seeks to utilise access to the rail network along the strategic corridors where it exists and has identified these opportunities in the policy. Notwithstanding these opportunities, the spatial geography of the network and the connectivity provided by rail services and their timetabling are such that SP14 cannot rely wholly on rail connectivity to improve accessibility to employment opportunities in the County. SP14 also correctly supports those opportunities created by the strategic and principal road networks and particularly in locations where rail connectivity is not an option or is not available.	No
A0014	B032	Para 2 of draft Policy SP14 should recognise that wildlife sites are effected more by transport than just 'atmospheric emissions'.	SP14 criterion 2 recognises that development along strategic corridors through the Green Belt and AONB may have a broad range of impacts which must be managed in relation to national and local policies. The reference to 'atmospheric emissions' relates to the very specific impacts on internationally designated wildlife sites where a Habitats Regulation Assessment may be required.	No
A0014	B033	Para 4a of draft Policy SP14 needs to achieve a balance between housing, employment and environmental growth.	SP14 criterion 4a does require that the delivery of employment development should be generally balanced with the provision of housing to ensure a sustainable pattern of development in any particular location to help deliver a sustainable growth strategy in Shropshire. However, prior to these considerations being accorded weight in any decision whether to grant approval to develop, criterion 4c requires the impacts of the proposals on a series of environmental characteristics to also be considered. SP14 criterion 4 therefore requires the three dimensions of sustainability to be taken into account as required in national policy.	No
A0014	B034	1. Remove reference to the A5 West, A41 and A49 corridors in para 3.142. 2. Remove reference to HS2 in para 3.142.	The draft Shropshire Local Plan is supported by and has regard to a number of other strategies produced by the Council and other bodies, including the Economic Growth Strategy for Shropshire and Government proposals for formation of HS2. Proposals such as HS2 cannot be ignored and would represent an economic opportunity for Shropshire, although it is important to note that none of the proposals in the draft Shropshire Local Plan are dependent on the delivery of this project. The Economic Growth Strategy for Shropshire identifies a series of strategic corridors, which are considered the principal rail and/or strategic road routes through the County, which it identifies as the primary focus for major employment development. One such corridor is the A5 West corridor, upon which Oswestry, the largest Principal Centre and second largest settlement is located; another such corridor is the North East Shropshire and the A41 corridor, upon which Whitchurch and Market Drayton are located, both of which are considered Principal Centres within the Shropshire Local Plan; as is the A49 corridor, upon which Ludlow, a Principal Centre is located. The draft Shropshire Local Plan seeks to prioritise significant new development and infrastructure investment into the Strategic, Principal and Key Centres and identified Strategic Sites to create 'growth zones' along the identified 'strategic corridors' through Shropshire and make effective use of the rail and road routes through these corridors. This is considered a sustainable approach to the development of Shropshire.	No
A0014	B035	1. Amend para 3.144 to amend reference to environmental constraints. 2. Remove reference to development being supported under 'very special circumstances'.	The reference to "environmental constraints" in paragraph 3.134 of the Explanation to Policy SP13 does not imply any judgements on the significance and benefits of any environmental considerations to be addressed in the development of employment land in the County. The guidance in the policy seeks to ensure that whilst these environmental considerations might have the effect of reducing the developable area of the site, any reduction in the proposed site and any consequent treatment of environmentally sensitive areas, will make a positive contribution to the quality and utility of the proposed employment development. Whilst the opportunity to undertake development in the Green Belt may be considered less than desirable, national policy does make provision for this to occur. This may happen where development accords with a prescribed lists in national policy of 'appropriate' land uses or development operations in the Green Belt. This may also occur where a landowner or a developer can show that a development is required through 'very special circumstances' defined by them in an application to develop Green Belt land. SP14 recognises that development may be permitted in 'very special circumstances' and this will ensure there is sufficient flexibility in the Local Plan to respond to changes in circumstances within the Green Belt.	No
A0014	B036	Provide a definition of an estate. Include reference to Nature Recovery Networks within the policy.	Noted. It is not considered that a definition of an Estate need to be specifically provided within the draft Shropshire Local Plan. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP12 addresses biodiversity net gain, it includes "Ensuring that all development delivers at least a 10% net gain for biodiversity in accordance with the Environment Act, any future Local Nature Recovery Strategy (LNRS) and policies DP14, DP15, DP16 and DP22."	No
A0014	B037	Para 3.159 should indicate that restoration and aftercare of mineral sites should follow biodiversity net gain principles.	Para 3.159 recognises that restoration and aftercare of mineral sites provides positive opportunities to deliver environmental or community benefits. Draft Policy DP12. The Natural Environment addresses biodiversity net gain, it includes "Ensuring that all development delivers at least a 10% net gain for biodiversity in accordance with the Environment Act, any future Local Nature Recovery Strategy (LNRS) and policies DP14, DP15, DP16 and DP22."	No
A0014	B038	Include more reference to Government's 25 Year Environment Plan within the document. Particularly draft Policies SP3, SP4, and SP9.	Noted. It is considered that the principles of the Government's 25 Year Environment Plan are appropriately embedded within the draft Shropshire Local Plan. The draft Shropshire Plan should be read as a whole.	No
A0014	B039	Policies should encourage and enable reduction of waste.	Noted. Where evidence indicates that waste production will increase draft policies are required to ensure that there is sufficient capacity to manage this additional waste, as recognised within para 3.164 of the Explanation to draft Policy SP17. Waste Management Infrastructure.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0014	B040	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	Not Specified	Not Specified	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield.
A0014	B041	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP4	Not Specified	Not Specified	Not Specified	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield.
A0014	B042	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP5	Not Specified	Not Specified	Not Specified	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield.
A0014	B043	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP6	Not Specified	Not Specified	Not Specified	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield.
A0014	B044	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP7	Not Specified	Not Specified	Not Specified	There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield.
A0014	B045	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP9 and Para 4.91	Not Specified	Not Specified	Not Specified	Support town centre development proposals which promote ethical, sustainable, and low-carbon consumer opportunities.
A0014	B046	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP10	Not Specified	Not Specified	Not Specified	Developers should be required to contribute to the upkeep of natural assets to maintain and enhance the tourism offer.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0014	B040	Draft Policy DP3 should require more accessible natural greenspace should be provided for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield.	Noted. Draft Policy DP3. Affordable Housing Provision includes a policy requirement of "Ensuring that affordable housing is appropriately distributed within the site, their locations maximise opportunities for future residents to access services and facilities by walking, cycling or public transport and minimises the exposure of future residents to sources of noise or reduced air quality." Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole.	No
A0014	B041	Draft Policy DP4 should require more accessible natural greenspace should be provided for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield.	Noted. Draft Policy DP4. Affordable Housing Exceptions Schemes states such schemes will be positively considered where they meet all of a series of policy requirements, including "It is served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport". Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole.	No
A0014	B042	Draft Policy DP5 should require more accessible natural greenspace should be provided for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield.	Noted. Draft Policy DP5. Entry Level Exception Sites states such schemes will be positively considered where they comply with a series of policy requirements, including "It is served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport". Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole.	No
A0014	B043	Draft Policy DP6 should require more accessible natural greenspace should be provided for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield.	Noted. Draft Policy DP6. Single Plot Exception Sites states such schemes will be considered where they comply in circumstances where factors including "It is served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport" occur. Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole.	No
A0014	B044	Draft Policy DP7 should require more accessible natural greenspace should be provided for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield.	Noted. Draft Policy DP7. Cross-Subsidy Exception Schemes states such schemes will be positively considered where all of a series of policy requirements are satisfied, including "The affordable housing is appropriately distributed within the site, their locations maximise opportunities for future residents to access services and facilities by walking, cycling or public transport and minimises the exposure of future residents to sources of noise or reduced air quality" and "It is served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport". Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole.	No
A0014	B045	N/A	Noted.	No
A0014	B046	Draft Policy DP10 should require developers to contribute to the upkeep of natural assets to maintain and enhance the tourism offer.	Noted, however the upkeep of natural assets to maintain and enhance the tourism offer is outlined under DP10 1c and 1f: "emphasis will be placed on]": Supporting development that promotes opportunities for accessing, understanding and engaging with Shropshire's landscape, cultural and historic assets including the Shropshire Hills AONB, rights-of-way network, canals, rivers, meres and mosses. Development must also meet the requirements of Policy DP14 [Green Infrastructure];" and "Supporting schemes aimed at diversifying the rural economy for tourism, cultural and leisure uses that are appropriate in terms of their location, scale and nature, which retain and enhance existing natural features where possible, and do not harm Shropshire's tranquil nature;"	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0014	B047	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP10(f)	Not Specified	Not Specified	Not Specified	The natural environment has been recognised as the major draw for tourists to the County. Retaining and enhancing natural features is therefore key to the long-term success of the tourism industry. Stronger wording is recommended.
A0014	B048	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	Not Specified	Not Specified	Welcome this policy but feel that it needs both greater ambition and strength.
A0014	B049	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11(1c)	Not Specified	Not Specified	Not Specified	Welcome para 1c, but would like to see a commitment to an increased level of on-site renewable energy sources.
A0014	B050	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11(2)	Not Specified	Not Specified	Not Specified	Consider large commercial/industrial development must provide a percentage of their predicted energy needs through on-site renewable and low carbon sources (consistent with proposed requirements for residential development). Believe only the BREEAM assessment should be used, as this is the leading assessment tool available.
A0014	B051	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11(4)	Not Specified	Not Specified	Not Specified	Disappointing that profit wins against reducing carbon emissions and addressing climate change in para 4.
A0014	B052	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12(3)	Not Specified	Not Specified	Not Specified	10% gain for nature is not ambitious enough. Government proposals indicate at least 10% and both Wildlife Trusts and UN have identified a need for 30% of land to be protected and in recovery for nature. The Nature Recovery Strategy is about much more than just Biodiversity Net Gain and should be a constant theme throughout the plan.
A0014	B053	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP13(4)	Not Specified	Not Specified	Not Specified	Add areas within any future Nature Recovery Network into the list of natural assets.
A0014	B054	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP13(5)	Not Specified	Not Specified	Not Specified	Proposals which are shown to have an adverse effect, directly, indirectly or cumulatively, to those natural assets listed in para 4 should be refused.
A0014	B055	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP13(7)	Not Specified	Not Specified	Not Specified	The 'bigger' element of the Lawton principle is missing here. Policies should seek to maximise the size of environmental assets.
A0014	B056	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP13(8)	Not Specified	Not Specified	Not Specified	Reference should be made to the Marches Woodland Strategy.
A0014	B057	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP13(8c and 8e)	Not Specified	Not Specified	Not Specified	Greater emphasis should be placed on protecting existing trees/woodland/hedgerow assets. Phrases such as 'overriding reasons/benefits for development to proceed' are unclear and will result in the loss of existing trees and hedgerows. Replace hedgerows with hedgerows at least as diverse, or ideally more, in conjunction with biodiversity enhancement and gain.
A0014	B058	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.116	Not Specified	Not Specified	Not Specified	Priority habitats and species, as outlined by Natural England, should be added to the list of triggers for assessment.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0014	B047	The wording of draft Policy DP10 should be strengthened to more effectively retain and enhance natural features.	Noted, however the upkeep of natural assets to maintain and enhance the tourism offer is outlined under DP10 1c and 1f: "emphasis will be placed on]": Supporting development that promotes opportunities for accessing, understanding and engaging with Shropshire's landscape, cultural and historic assets including the Shropshire Hills AONB, rights-of-way network, canals, rivers, meres and mosses. Development must also meet the requirements of Policy DP14 [Green Infrastructure];" and "Supporting schemes aimed at diversifying the rural economy for tourism, cultural and leisure uses that are appropriate in terms of their location, scale and nature, which retain and enhance existing natural features where possible, and do not harm Shropshire's tranquil nature;" There is also emphasis throughout the policy on protection with developments relating to the AONB.	No
A0014	B048	The wording of draft Policy DP11 should be strengthened.	The Council considers that this policy introduces effective and appropriate policy requirements for new development to contribute to reducing impact on climate change, whilst also ensuring compliance with national policy and legislation and ensuring the continued viability of development.	No
A0014	B049	Increase the requirement for on-site renewable energy generation within para 1c of draft Policy DP11.	Subsection 1 (a) of the 2008 Planning and Energy Act states that Local Authorities may include policies imposing reasonable requirements for 'a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development' provided these are consistent with national policy. National policy is the 2015 Written Ministerial Statement which allows Local Planning Authorities to set Code for Sustainable Homes level 4 energy standards. The policy reflects this standard. No change proposed.	No
A0014	B050	1. Require large commercial/industrial development. 2. In para 2 of draft Policy DP11, only allow use of BREEAM assessment to measure the energy performance of non-residential development.	The Council considers that this policy introduces effective and appropriate policy requirements for new development to contribute to reducing impact on climate change, whilst also ensuring compliance with national policy and legislation and ensuring the continued viability of development.	No
A0014	B051	1. Remove reference to the requirements of draft Policy DP11. Minimising Carbon Emissions not applying where it would make development unviable.	The Council considers that this policy introduces effective and appropriate policy requirements for new development to contribute to reducing impact on climate change, whilst also ensuring compliance with national policy and legislation and ensuring the continued viability of development.	No
A0014	B052	1. In para 4 of draft Policy DP12, increase the level of biodiversity net gain to in excess of 10%. 2. Recognise that the Nature Recovery Strategy is about much more than just Biodiversity Net Gain and should be a constant theme throughout the plan.	1. The requirement for a 10% net gain for biodiversity reflects the provisions of the Environment Bill and the Council thus considers it to be appropriate. 2. The Environment Bill makes it clear that biodiversity net gain will be delivered through the Local Nature Recovery Strategy so the Council considers the policy requirement to be appropriate.	No
A0014	B053	In para 4 of draft Policy DP12, add areas within any future Nature Recovery Network into the list of natural assets.	This comment is identified as relating to para 4 of draft Policy DP13, however it appears to relate to para 4 of draft Policy DP12 (DP12 was referenced as DP13 within the earlier consultation on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan). The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that neither of these support this proposed amendment. No change proposed.	No
A0014	B054	Para 5 of draft Policy DP12 should stipulate that proposals which are shown to have an adverse effect, directly, indirectly or cumulatively, to those natural assets listed in para 4 should be refused.	This comment is identified as relating to para 5 of draft Policy DP13, however it appears to relate to para 5 of draft Policy DP12 (DP12 was referenced as DP13 within the earlier consultation on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan). The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that neither of these support this proposed amendment. No change proposed.	No
A0014	B055	Para 7 of draft Policy DP12 should include maximising the size of environmental assets.	This comment is identified as relating to para 7 of draft Policy DP13, however it appears to relate to para 7 of draft Policy DP12 (DP12 was referenced as DP13 within the earlier consultation on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan). The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that neither of these support this proposed amendment. No change proposed.	No
A0014	B056	Para 8 of draft Policy DP12 should include reference to the Marches Woodland Strategy.	Noted. It is identified as relating to para 8 of draft Policy DP13, however it appears to relate to para 8 of draft Policy DP12 (DP12 was referenced as DP13 within the earlier consultation on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan). The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that neither of these support this proposed amendment. No change proposed.	No
A0014	B057	Paras 8(c) and 8(e) of draft Policy DP12 should be clarified, to place greater emphasis on protecting existing trees, woodland and hedgerows and require that where hedgerows are lost they are replaced with other equally or more diverse hedgerows.	This comment is identified as relating to para 8 of draft Policy DP13, however it appears to relate to para 8 of draft Policy DP12 (DP12 was referenced as DP13 within the earlier consultation on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan). The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that neither of these support this proposed amendment. No change proposed.	No
A0014	B058	Para 4.116 should include reference to priority habitats and species, as outlined by Natural England.	The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that this proposed amendment is not necessary. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0014	B059	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.121	Not Specified	Not Specified	Not Specified	There is a high level of subjectivity and scope for how biodiversity net gain will be determined. Most schemes will require Local Authority ecologists to determine biodiversity net gain. However, partner organisations such as Natural England and Shropshire Wildlife Trust should be consulted in some circumstances. Assume the biodiversity net gain assessments will be done using the latest Defra metric. There needs to be explicit mention of how biodiversity net gain will be monitored and assessed to ensure long-term net gain is delivered.
A0014	B060	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.123	Not Specified	Not Specified	Not Specified	Understand the Nature Recovery Network (under the Local Nature Strategy) will supersede Shropshire Environmental Network (SEN). This should be made clear.
A0014	B061	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.124	Not Specified	Not Specified	Not Specified	How are public benefits and the value of effected assets going to be measured and assessed against each other?
A0014	B062	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.133(c)	Not Specified	Not Specified	Not Specified	Reference to biodiversity net gain as part of compensation measures.
A0014	B063	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.127	Not Specified	Not Specified	Not Specified	Mitigation/compensation measures need to be delivered in a timely manner, in accordance with biodiversity net gain principles. A 'timely manner' means the measure is in place prior to loss of assets. Concerned delivery of measures in unclear in para 4.127 (text references both 4.137 and 4.127, however comments appear to relate to 4.127).
A0014	B064	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.128	Not Specified	Not Specified	Not Specified	It should be made clear that para 4.128 is a last resort, given the current state of the natural environment and best practice.
A0014	B065	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.132	Not Specified	Not Specified	Not Specified	Greater emphasis should be placed on protecting existing trees/woodland/hedgerow assets. Phrases such as 'overriding reasons/benefits for development to proceed' are unclear and will result in the loss of existing trees and hedgerows. Replace hedgerows with hedgerows at least as diverse, or ideally more, in conjunction with biodiversity enhancement and gain.
A0014	B066	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP13	Not Specified	Not Specified	Not Specified	Welcome this policy and would not like to see it compromised in any way.
A0014	B067	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP14	Not Specified	Not Specified	Not Specified	Welcome this policy and would not like to see it compromised in any way.
A0014	B068	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP14(4)	Not Specified	Not Specified	Not Specified	Green space should be managed and maintained for at least the lifetime of any development.
A0014	B069	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.144	Not Specified	Not Specified	Not Specified	Question the infeasibility of producing a green infrastructure opportunity map around Community Hubs and Community Clusters. If this is purely due to a lack of resources, partnership with other organisations should be explored to develop a map? Paragraph 174 of the NPPF suggests maps are needed for restoration/creation areas.
A0014	B070	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.148	Not Specified	Not Specified	Not Specified	Both quality and quantity of open space is important and perhaps need to be considered more equally.
A0014	B071	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP16	Not Specified	Not Specified	Not Specified	Species for landscaping should be of local provenance wherever possible, unless there are other environmental justifications. Landscaping opportunities afforded by green roofs and facades should be encouraged.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0014	B059	Para 4.121 should be explicit about how biodiversity net gain will be monitored and assessed. It should also reference the latest Defra metric and acknowledge that in some circumstances partner organisations should be consulted.	These issues are set out in the Environment Bill and as such, are outside the remit of the Local Plan. No change proposed.	No
A0014	B060	Para 4.123 should clarify that the Nature Recovery Network (under the Local Nature Strategy) will supersede SEN.	The Council does not consider this change to be necessary.	No
A0014	B061	Para 4.124 should clarify how public benefits and the value of effected assets are to be measured and assessed against each other?	These issues are set out in the Environment Bill and as such, are outside the remit of the Local Plan. No change proposed.	No
A0014	B062	Para 4.133(c) should reference biodiversity net gain as part of the compensation measures.	This issue is set out in the Environment Bill and as such, is outside the remit of the Local Plan. No change proposed.	No
A0014	B063	Para 4.127 should be clearer about delivery of mitigation/compensation measures.	The Council does not consider this change to be necessary.	No
A0014	B064	Para 4.128 should be clear that this option is a last resort.	The Council does not consider this change to be necessary.	No
A0014	B065	Paras 4.132 should be clarified, to place greater emphasis on protecting existing trees, woodland and hedgerows and require that where hedgerows are lost they are replaced with other equally or more diverse hedgerows.	The Council does not consider this change to be necessary.	No
A0014	B066	N/A	Support welcomed.	No
A0014	B067	N/A	Support welcomed	No
A0014	B068	Para 4 of draft Policy DP14 should	The Council does not consider these amendments are necessary.	No
A0014	B069	Green Infrastructure Opportunity Mapping should be undertaken for proposed Community Hubs and Community Clusters.	The Council considers the approach taken to the mapping of Green Infrastructure is proportionate and appropriate and does not preclude work being carried out in the future.	No
A0014	B070	Para 4.148 should recognise that both quantity and quality of open space need to be considered equally.	The Council does not consider this amendment is necessary.	No
A0014	B071	1. Draft Policy DP16 should specify that planting should be of local provenance wherever possible, unless there are other environmental justifications. 2. Landscaping opportunities afforded by green roofs and facades should be encouraged.	1. Paragraph 4 of the Policy states that native species of local provenance are preferred. 2. This amendment is not considered necessary.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0014	B072	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18	Not Specified	Not Specified	Not Specified	Welcome this policy and hope it will address concerns about the number of intensive livestock unit developments in the County. Special Areas of Conservation, other than the River Clun, and the majority of sensitive habitats are beyond critical thresholds.
A0014	B073	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18(4)	Not Specified	Not Specified	Not Specified	Welcome greater protection for the County's best agricultural land. Additional consideration should be given to peatland areas where development should be further resisted to prevent loss of future opportunities for restoration, biodiversity gain and carbon sequestration.
A0014	B074	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP19(3)	Not Specified	Not Specified	Not Specified	Proposals with any potential to effect water quality in Source Protection Zone 1 should be refused.
A0014	B075	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP19(6)	Not Specified	Not Specified	Not Specified	An explicit hierarchy of measures for conserving and enhancing watercourses and riverside habitats should be provided, with management the highest priority and compensation the lowest.
A0014	B076	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP19(6 and 7)	Not Specified	Not Specified	Not Specified	Welcome aim to conserve, enhance, and restore river course and riverside habitats.
A0014	B077	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP20(1)	Not Specified	Not Specified	Not Specified	Complying with building regulations should be a minimum requirement.
A0014	B078	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP20(2)	Not Specified	Not Specified	Not Specified	Do not consider that achieving BREEAM 'good' status is ambitious enough (this is the second worst standard).
A0014	B079	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP21(7c)	Not Specified	Not Specified	Not Specified	How can development in Food Zone 3 achieve no net loss of floodplain storage.
A0014	B080	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP22(12)	Not Specified	Not Specified	Not Specified	Welcome this policy.
A0014	B081	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.190	Not Specified	Not Specified	Not Specified	A potential failure of the Sequential Test is it identifies the 'least bad' option, highlighted by the fact some allocated sites are in flood zone 2/3.
A0014	B082	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23(1)	Not Specified	Not Specified	Not Specified	Remove 'wherever possible' from para 1, as it is weak wording.
A0014	B083	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.226	Not Specified	Not Specified	Not Specified	Local strategic highway improvements should be aimed at improving provision of public transport, walking and cycling.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0014	B072	Draft Policy DP18 should recognise that Special Areas of Conservation, other than the River Clun, and the majority of sensitive habitats are beyond critical thresholds.	The Plan should be read as a whole. Policy DP12 sets out requirements for HRA of development proposals so the Council does not consider it necessary to make the suggested change.	No
A0014	B073	1. N/A 2. Para 4 of draft Policy DP18 should provide further protection of peatland areas.	1. Support welcomed. 2. The Plan should be read as a whole. Policy DP12 sets out requirements to protect habitats so the Council does not consider it necessary to make the suggested change.	No
A0014	B074	Para 3 of draft Policy DP19 should stipulate that proposals with any potential to effect water quality in Source Protection Zone 1 will be refused.	Amendment not accepted. Any discharge of pollutants which enter groundwater directly, or may enter into the soil and reach groundwater, is a groundwater activity. Such an activity requires an environmental permit which is administered by the Environment Agency. The planning system should not duplicate other regulatory regimes. No change proposed.	No
A0014	B075	Para 6 of draft Policy DP19 should provide a hierarchy of measures for conserving and enhancing watercourses and riverside habitats, ranging from management (highest) to compensation (lowest).	The Plan should be read as a whole. Policy DP12 sets out requirements for the conservation of habitats so the Council does not consider it necessary to make the suggested change.	No
A0014	B076	N/A	Noted.	No
A0014	B077	Para 1 of draft Policy DP20 should recognise that compliance with Building Regulations standards on water efficiency should be a minimum.	As explained within the para 4.185 of the Explanation of draft Policy DP20, Government has introduced an optional new Building Regulation standard that can be required through a Local Plan policy if it addresses a clearly evidenced need and its impact on viability has been considered. The Council can then apply the optional requirement as a planning condition on residential development proposals. This will be overseen by Building Control bodies (local authorities or approved inspectors). The optional requirement set out in the Building Regulation restricts water use to 110 litres per person per day whereas the normal requirement is 125 litres per person per day. The Shropshire Water Cycle Study recommends that new residential development in Shropshire adopts the 110 litres per person per day standard. This has been considered through the Shropshire Viability Study and forms the basis for this policy. It can be met through either a fittings-based approach, which imposes maximum consumption rates for various fittings such as WCs, basin taps, and showers, or by calculating the whole house water consumption using a 'water efficiency calculator' for new dwellings. As such para 1 of draft Policy DP20 is not suggesting that development can fail to comply with Building Regulations, rather it offers flexibility regarding the achievement of the optional standard introduced within the draft Policy, in circumstances where it is demonstrated how and why it cannot be attained.	No
A0014	B078	Para 2 of draft Policy DP20 should require the achievement of a higher BREEAM standard than 'Good' for non-domestic buildings in relation to water efficiency.	The Council considers that a 'Good' BREEAM standard is appropriate for non-domestic properties.	No
A0014	B079	An explanation should be provided as to how development in Food Zone 3 achieve no net loss of floodplain storage.	This policy follows national planning policy and as such is considered appropriate.	No
A0014	B080	N/A	Noted.	No
A0014	B081	Unclear.	This policy follows national planning policy and as such is considered appropriate.	No
A0014	B082	Remove 'wherever possible' from para 1 of draft Policy DP23.	The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that this proposed amendment is not necessary. No change proposed.	No
A0014	B083	Para 4.226 should stipulate that local strategic highway improvements should be aimed at improving provision of public transport, walking and cycling.	Para 4.226 provides examples of statutory and critical infrastructure needs, including local and strategic highway improvements. Local and strategic highway improvements may of course include infrastructure associated with walking, cycling and public transport. The prioritisation of infrastructure is undertaken through the Strategic Infrastructure Implementation Plan and Place Plan process.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0014	B084	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP26	Not Specified	Not Specified	Not Specified	Welcome this policy.
A0014	B085	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP27	Not Specified	Not Specified	Not Specified	Welcome the move away from less sustainable practices (reducing need to travel, etc.).
A0014	B086	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP28(2 and 3(d, e and g))	Not Specified	Not Specified	Not Specified	1. Agree, we should respond positively to climate problems, but feel focus on unsustainable transport should be reconsidered. For example, DP28(3d, e and g) still promote road and other unsuitable transport links, i.e. HS2. 2. Explicit support of the NWRR is not supported.
A0014	B087	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.257	Not Specified	Not Specified	Not Specified	Inclusion and support of the NWRR in the draft Shropshire Local Plan compromises any attempt at sustainability or addressing the climate and ecological emergency. The NWRR would be contrary to a number of policies in the plan including, SP3, DP1, DP5, DP15, DP16, DP17, DP18, DP20, DP23 and DP24.
A0014	B088	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP31 (4)	Not Specified	Not Specified	Not Specified	No justification for winning and working of coal when we are facing a Climate Emergency.
A0014	B089	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.274	Not Specified	Not Specified	Not Specified	Mineral aftercare potential should follow Biodiversity Net Gain principles.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0014	B084	N/A	Support welcomed.	No
A0014	B085	N/A	Shropshire Council welcomes the support for Policy DP27 as evidence of the soundness of the Draft Local Plan. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. This is especially promoted through Policy DP27 and the key objectives of the policy to deliver high quality, digital infrastructure that meets the needs of businesses and communities as an essential utility to support their quality of life, to facilitate social inclusion and reduce the need to travel to access work, services and leisure opportunities particularly to support how they choose to work, live and seek to lower the 'carbon footprint' of their business operation or lifestyle.	No
A0014	B086	1. Reduce focus on unsustainable modes of transport within para 3d, e and g of draft Policy DP28. 2. Remove reference/support for the NWRR in para 3e of draft Policy DP28.	Policy DP28 recognises that a sustainable transportation system for Shropshire must include a range of transport networks and services and present a range of travel options to individuals, households, organisations and businesses. Policy DP28 constructs the transportation system into a hierarchy to promote sustainable choices by informing and encouraging those travelling or transporting goods to choose sustainable transport options to meet their needs. Although this hierarchy includes modes of transport considered to be unsustainable, these options are still part of the transportation system and may be the best or only means by which to travel or transport goods over long distances or to access less well connected places. Policy DP28 also recognises the need for more sustainable choices in looking towards the delivery of new travel and transport options, in advocating the Hierarchy of Sustainable Transport as a simple decision pathway for everyone to follow in making their choices about travel and transport and by encouraging everyone to consider how they can contribute to reversing adverse changes to our environment. <i>The objection to the inclusion of the Shrewsbury North West Relief Road in Policy DP28(3)(e) and paragraph 4.257 is addressed under representation A0014 B87.</i>	No
A0014	B087	Remove reference/support for the NWRR in para 4.257.	Shropshire Council has set out in Policy DP28 the summary explanation for the North West Relief Road from the Outline Business Case for the construction of this new road. The primary purpose of the road is to link the urban highway network in both the north and the west of the town together to remove the need for local and through traffic to circumnavigate the east, south and west quadrants of the town or to travel through the town centre s opposed to simply traversing the north-west quadrant of the town. This strategic infrastructure proposal has been included in Policy DP28 to recognise a fundamental principal of the Hierarchy of Sustainable Transport which is the continuing need for private motor transport particularly with the national programme to move to vehicles with electronic power cells and other non-fossil fuel energy sources. This continuing need for private transport brings with it a need for essential improvements or new construction on the highway networks to support its use in order to properly serve the needs of the economy and the communities in Shropshire, the West Midlands and England. Shropshire Council considers that the principles and objectives of the Hierarchy of Sustainable Transport and the NWRR are mutually inclusive and contribute to the strengths and opportunities provided by a broad based, balanced and ambitious Local Plan. The Council considers that these two principles and objectives for the Hierarchy of Sustainable Transport and the provision of the NWRR are consistent with the strategy of the Local Plan. The policy framework is also internally consistent with the inclusion of the NWRR in Policy DP28 when the plan is read as a whole.	No
A0014	B088	Delete para 4 of draft Policy DP31.	Any Planning Application for the winning and working of coal will be determined in accordance with the NPPF. Para 211 of the NPPF states "Planning permission should not be granted for the extraction of coal unless: a) the proposal is environmentally acceptable, or can be made so by planning conditions or obligations; or b) if it is not environmentally acceptable, then it provides national, local or community benefits which clearly outweigh its likely impacts (taking all relevant matters into account, including any residual environmental impacts)." Para 4 of draft Policy DP31 establishes a policy requirement for any such application to also include proposals for the separation and stockpiling of fireclay so that its value as a mineral resource can be captured.	No
A0014	B089	Mineral restoration and aftercare references in Para 4.274 should be amended to follow Biodiversity Net Gain principles.	Para 4.274 recognises that restoration and aftercare of mineral sites provides positive opportunities to deliver environmental or community benefits. It also recognises that we therefore need to establish policies to support mineral working which helps to secure locally sensitive design and to ensure that high quality restoration and aftercare of mineral sites takes place at the earliest opportunity and, wherever possible, helps to secure green infrastructure or environmental and community benefits identified in the relevant local Place Plan. Draft Policy DP12. The Natural Environment addresses biodiversity net gain, it includes "Ensuring that all development delivers at least a 10% net gain for biodiversity in accordance with the Environment Act, any future Local Nature Recovery Strategy (LNRS) and policies DP14, DP15, DP16 and DP22."	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0014	B090	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S1-S18	Not Specified	Not Specified	Not Specified	<p>More regard should be given to the Shropshire Environment Network (SEN), both in terms of limiting impacts on priority habitat areas (core areas of SEN) and identifying areas for biodiversity enhancement and net gain (restoration areas of SEN).</p> <p>Future allocations should reference the Nature Recovery map (when it becomes available) in the same way as the SEN.</p> <p>In addition to mitigation of impacts on Special Areas of Conservation, there is also a need to mitigate impacts on local wildlife sites, Shropshire Wildlife Trust (SWT) reserves and national and local nature reserves.</p> <p>The wording 'where possible' should consistently be strengthened.</p> <p>Concerned about the location and impact of windfall sites.</p> <p>Concerned about the proximity to SSSI's and the lack of mitigation of them in association with the saved mineral allocation at Wood Lane (near Colmere); CLV012/018; PH004; SHR173; and MIN007.</p>
A0014	B091	Sustainability Appraisal	Whole Document	Not Specified	Not Specified	Not Specified	<p>Consider the Sustainability Appraisal (SA) fails to:</p> <ul style="list-style-type: none"> <li>Consider how a plan contributes to improvements in environmental, social and economic conditions.</li> <li>Identify any significant adverse effects that a plan might have.</li> <li>Amend proposals in a plan to avoid any significant adverse effects.</li> <li>Propose mitigation measures to counter any remaining significant adverse effects.</li> </ul> <p>There has been little done to respond to concerns raised during previous consultations.</p> <p>It is incredible that the SA concludes that the delivery of 30,800 new dwellings and around 300 hectares of employment land with all the associated infrastructure will have no significant negative effects.</p> <p>The layout of the document is very confusing and hard to follow so it has proved impossible to give comments on particular sections as paragraph numbering is sporadic.</p> <p>Amendments to the SA site assessment methodology are insufficient to address the key issue of climate change (assessing whether a bus stop is within 480m gives an indication of the scale of the problem).</p> <p>Unable to check the assessment of all sites but note fundamental scoring errors. For example, SHR173: although the presence of an adjacent Local Wildlife Site and nearby SSSI are mentioned in various sections of text, they are not counted in the assessment matrix. Also, the site scores well in terms of the climate change assessment (bus stop within 480m) despite the scale of associated car journeys meaning development is dependent on the proposed North West Relief Road to accommodate traffic.</p>
A0014	B092	Habitats Regulations Assessment	Habitats Regulations Assessment Whole Document	Not Specified	Not Specified	Not Specified	<p>Despite passing stage 2 of the HRA, question the assessment of Hencott Pool and the decision that the increased buffer (now over 200m) between the proposed North West Relief Road and the site is sufficient to determine that there will be no significant impacts.</p> <p>Construction of a major road within 200m of a site of international importance surely raises some uncertainty as to the significance of impacts.</p> <p>Within this assessment the possibility of windfall development (the potential for this is identified in para 5.224 of the local plan consultation document) should also be considered.</p>
A0015	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	No	Work on the Local Plan should pause for a year to allow the effects of COVID-19 to calm down. More regard needed to Carbon emissions
A0016	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S8.2 Ellesmere DUD006	Yes	Yes	Yes	It is not expected that the proposed development would have an adverse impact upon our sewerage assets. The site is crossed by a public sewer which may restrict development density for the site.
A0016	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 St Martins SMH031	Yes	Yes	Yes	The public sewerage network can accept the potential foul flows from the proposed development site however an assessment of the Sewage Pumping Station (SPS) would need to be undertaken to establish whether improvements are required. Potential developers need to be aware that this site is crossed by a sewer and protection measures in the form of an easement width or a diversion of the pipe would be required which may impact upon the housing density achievable on site.
A0016	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 St Martins SMH038	Yes	Yes	Yes	The public sewerage network can accept the potential foul flows from the proposed development site.
A0016	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Weston Rhyn WRP001VAR	Yes	Yes	Yes	A hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows. Potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades which can be requisitioned through the provisions of the Water Industry Act 1991 (as amended). The sewerage system in this area drains to Five Fords WwTW which can accommodate the foul flows from the proposed growth figure.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0014	B090	<p>1. Give more regard to the Shropshire Environment Network (SEN), both in terms of limiting impacts on priority habitat areas (core areas of SEN) and identifying areas for biodiversity enhancement and net gain (restoration areas of SEN).</p> <p>2. Reference the Nature Recovery map (when it becomes available) for future allocations.</p> <p>3. Identify mitigation for impacts on local wildlife sites, SWT reserves and national and local nature reserves.</p> <p>4. Strengthen the wording 'where possible' throughout Policies S1-S18.</p> <p>5. Concerned about the location and impact of windfall sites.</p> <p>6. Concerned about the proximity to SSSI's and the lack of mitigation of them in association with the saved mineral allocation at Wood Lane (near Colmere); CLV012/018; PH004; SHR173; and MIN007.</p>	The Council considers that draft Policy DP12 The Natural Environment appropriately addresses the issues raised.	No
A0014	B091	The Sustainability Appraisal should be subject to a thorough review and rewrite.	<p>The Council considers that the SA and site assessment process complies with the Environmental Assessment of Plans and Programmes Regulations 2004 and is a robust, proportionate and fair way of evaluating sites.</p> <p>The comments on the scoring of site SHR173 are noted but the proposed changes to SA would not change the rating of the site (it would still be Fair) so are not considered necessary.</p>	No
A0014	B092	Re-assess impact of proposals on Hencott Pool, both those resulting from the North West Relief Road and potential Windfall development in the vicinity.	The Council is satisfied that the HRA correctly assesses the effect of the Local Plan on Hencott Pool, including any windfall development which might result should the North West Relief Road be constructed. No change proposed.	No
A0015	B001	Pause Local Plan process until COVID-19 issues are calmer. Greater consideration of carbon emissions.	No action needed - Shropshire Council must continue to develop the Local Plan. Measures have been put in place, such as extensions to the consultation, to assist with the limitations that the pandemic has caused.	No
A0016	B001	n/a	Noted.	No
A0016	B002	n/a	Noted.	No
A0016	B003	n/a	Noted.	No
A0016	B004	A hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows	Noted. The Council expects hydraulic modelling to be carried out by the developer at the planning application stage and assessed through the Development Management process. Information on capacity of Five Fords WwTW is welcomed (see also Statement of Common Ground with Dwr Cymru Welsh Water).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0016	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Weston Rhyn WRP017	Yes	Yes	Yes	A hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows. Potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades which can be requisitioned through the provisions of the Water Industry Act 1991 (as amended). The sewerage system in this area drains to Five Fords WwTW which can accommodate the foul flows from the proposed growth figure.
A0016	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 Whitchurch WHT042	Yes	Yes	Yes	A hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows. Potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades which can be requisitioned through the provisions of the Water Industry Act 1991 (as amended). The sewerage system in this area drains to Whitchurch WwTW which can accommodate the foul flows from the proposed growth figure.
A0016	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 Whitchurch WHT014	Yes	Yes	Yes	The public sewerage network can accept the potential foul flows from the proposed development site. The sewerage system in this area drains to Whitchurch WwTW which can accommodate the foul flows from the proposed growth figure.
A0016	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 Whitchurch WHT037 & 044	Yes	Yes	Yes	The public sewerage network can accept the potential foul flows from the proposed allocation. Welsh Water will seek to control the points of communication to the sewerage network via appropriate planning conditions as such there would be a requirement for off-site sewers to be provided to the boundary of the development site. The sewers can be requisitioned through the provisions of the Water Industry Act 1991 (as amended). The sewerage system in this area drains to Whitchurch WwTW which can accommodate the foul flows from the proposed growth figure.
A0017	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 St Martins	Not Specified	Not Specified	Not Specified	The Parish Council would therefore request that as part of the current review Shropshire Council consider moving Stan's store and playing field to the rear within the development boundary as a minor modification to the Plan
A0018	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21: RAF Cosford	Not Specified	No	Not Specified	Support identification of RAF Cosford as a Strategic Site. However, the area of land to be removed from the Green Belt is considered inadequate to meet the stated aims of the Local Plan and RAF Cosford operational requirements to be a growth zone on a strategic corridor. Given the mix of existing uses/users on the site (not identified on the site plan) and areas of open space protected from development, it is unclear how much developable land is actually available for the competing needs identified. Also much of the undeveloped land is in proximity of the runway and considered undevelopable whilst the runway remains in operation and its development would also undermine the air show. Development potential of available land is also restricted by extensive site guidelines. Constraints to the extent of land are evidenced by the need to remove 15ha of land from the Green Belt for the Midland Air Ambulance Charity. Therefore insufficient land is available to meet development needs to 2038 and beyond. The Local Plan is informed by a Green Belt Review, which should take account of potential demand post 2038 and this has not been allowed for in the current allocation as no land has been allocated as safeguarded land to accommodate the future growth of this strategic site. The area of land removed from the Green Belt has been artificially restricted to that in MOD ownership and this will reduce the ability of this strategic site to accommodate supporting uses as desired by the Local Plan.
A0019	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	Not Specified	Not Specified	Not Specified	Grinshill Parish Council wishes to re-affirm its requirement for Grinshill to become an independent Community Cluster. This is in line with our aspirations to maintain or enhance sustainability through modest levels of appropriate development.
A0020	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	No	Whilst the supporting text to the policy indicates that the Council have applied an uplift to the housing requirement over and above the standard method figure, do not consider that this is sufficient to adequately respond to the worsening market signals identified and that a greater uplift should be applied if the Council are to achieve its objective of securing economic growth. We do not consider that 1,500 dwellings is a sufficient contribution in light of the 27,000 dwelling shortfall in the Black Country.
A0020	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	No	Not Specified	Where no allocations are proposed as is the case of Woore, it undermines the ability of the settlement to ensure its longer term sustainability. We, therefore, consider the policy unsound as it is not effective in that it will not enable Woore to ensure its longer term sustainability which is set out as an objective in Policy SP2.
A0020	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	Not Specified	No	Not Specified	SP9 is overly restrictive in controlling new housing development on sites outside the development boundary around a settlement. The application of this policy in conjunction with SP7 will in our view lead to the constraint of new housing coming forward in Woore

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0016	B005	A hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows	Noted. The Council expects hydraulic modelling to be carried out by the developer at the planning application stage and assessed through the Development Management process. Information on capacity of Five Fords WwTW is welcomed (see also Statement of Common Ground with Dwr Cymru Welsh Water).	No
A0016	B006	A hydraulic modelling assessment (HMA) of the sewerage network will be required to assess its capacity to accommodate additional foul flows	Noted. The Council expects hydraulic modelling to be carried out by the developer at the planning application stage and assessed through the Development Management process. Information on capacity of the Whitchurch WwTW is welcomed (see also Statement of Common Ground with Dwr Cymru Welsh Water).	No
A0016	B007	n/a	Noted.	No
A0016	B008	n/a	Noted.	No
A0017	B001	Development Boundary should be amended to include Stans Stores and the adjacent playing pitch.	It is also considered that the proposed development boundary for St Martins is appropriate, having had due consideration of the built form of the settlement.	No
A0018	B001	The site to the west of the A41 bounded to the north by Sydnal Lane and to the west Shackerley Lane should be re-examined and removed from the Green Belt to ensure that Shropshire Council has removed sufficient land from the Green Belt to meet development requirements and ensure sufficient land is safeguarded for development beyond 2038.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No
A0019	B001	n/a	Noted.	No
A0020	B001	More than 1500 dwellings should be accommodated for in Shropshire for the Black Country.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0020	B002	There should be housing allocations in Woore.	Shropshire Council considers the proposals for Woore is appropriate. It should be noted that the Woore Neighbourhood Plan was recently adopted and allows for housing development in the settlement.	No
A0020	B003	There should be housing allocations in Woore.	Shropshire Council considers the proposals for Woore is appropriate. It should be noted that the Woore Neighbourhood Plan was recently adopted and allows for housing development in the settlement.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0020	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	Not Specified	Not Specified	The use classes that have been referred need updating in accordance with The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
A0020	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	Not Specified	Not Specified	We support the differentiation in the affordable housing requirement on those sites in the north of the County to sites in the south and welcome the lower threshold for sites in the north.
A0020	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.2 Community Hubs: Market Drayton Place Plan Area	Not Specified	No	Not Specified	The absence of an allocation in the Local Plan coupled with the Neighbourhood Plan's silence on allocating any land for residential development combine to seriously undermine the Council's objective of sustaining rural villages such as Woore.
A0020	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18. Whitchurch Place Plan Area	Not Specified	No	Not Specified	Concern over SAMDev sites: Tilstock Road site and Alport Road sites have not started and account for 600 dwellings. We contend that the Council should look at other sites particularly MPG's site at Tarporley Road.
A0021	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	No	No	No	Clive's score is incorrect - it should be 47. It's lack of employment and facilities make it unsuitable for Hub status. The shop and bowling green are either gone or private.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0020	B004	The use classes that have been referred need updating in accordance with The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.	The draft Shropshire Local Plan should be read as a whole. It is considered that draft Policies SP12 and other relevant policies such as draft Policy SP13 and SP14 appropriately consider and provide a framework for consideration of employment generating uses. Policy SP13 refers to the correct use classes as defined in the amendments of Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020	No
A0020	B005	N/A	Noted.	No
A0020	B006	There should be housing allocations in Woore, specifically a site on Audlem Road	Shropshire Council considers the proposals for Woore is appropriate. It should be noted that the Woore Neighbourhood Plan was recently adopted and allows for housing development in the settlement.	No
A0020	B007	In order to address our concern over soundness and delivery, we contend that the land at Tarporley Road should be considered for an allocation either instead of current allocations or sites that have been carried forward from the SAMDEV Plan, in order to meet housing needs in town in the early part of the Plan Period.	Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0021	B001	Remove the bowling green and village shop from the scoring, which would result in a score of 47, therefore giving Clive Cluster Status.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0022	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Not Specified	No	Not Specified	Clive should not be a Hub as some of its services are no longer available (bowling green is private and shop closed in Oct 2020). Taking these out would lower its score to 47.
A0023	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Bridgnorth	Not Specified	Not Specified	Not Specified	BRD030 is unacceptable as it will result in loss of agricultural land which is needed due to Brexit; loss of open space needed for physical & mental wellbeing; worsen pressure on Bridgnorth schools and medical facilities; and increase strain on road infrastructure. There has already been significant development and there is insufficient demand for new housing in Bridgnorth. Covid 19 will reduce demand for and affordability of housing and also demand for employment land. Development should be in Telford or the Black Country instead. Urbanising Bridgnorth would deter the tourist industry.
A0024	B001	Sustainability Appraisal	Para 16, App Q SHR060	Yes	No	Yes	Within SHR060 to its East boundary there is a large pool which is recognised within the Site Assessments of the Sustainability Appraisal (App Q p517-519). However, this fails to attract any negative scoring (p16) for what should be considered a Wildlife Site.
A0025	B001	Sustainability Appraisal	Page 518, App Q, SHR060	Not Specified	No	Not Specified	Insufficient information provided regarding the pool & its surroundings to the east
A0025	B002	Sustainability Appraisal	Para 16, App Q SHR060	No	No	Not Specified	Within the original Preferred Sites Assessment, SHR060 was given a rating of Good, now it is Fair. No mention has been made to the large wildlife pond, fen/marsh & surrounding grassland to the east of this site. If this was included, it would push the rating for this site towards the boundary of fair/poor. No inclusion of whether it can be included in the biodiversity net gain of $\geq 10\%$
A0025	B003	Sustainability Appraisal	Page 517 LVSS, App Q SHR060	Not Specified	No	Not Specified	As the LVSS provided an overall assessment for the three sites combined, it provides an inaccurate assessment for SHR060, therefore it is flawed.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0022	B001	Remove the bowling green and village shop from the scoring, which would result in a score of 47, therefore giving Clive Cluster Status.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0023	B001	Reduced the proposed housing guideline for Bridgnorth.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No
A0024	B001	The significant water feature which is recognised as a core/priority habitat (p518) should be given appropriate negative scores (1-3) in recognition of it being a Wild Life site (not yet officially recognised I believe) with permanent and amphibious residents and a significant spot for migrating birds such as Grey Lag and Canada Geese utilising the adjoining fields. This would then show that this site is on the closer end to a Poor site than just making Fair from Good. With a housing development already to its West bank, failure to protect this pond further could destroy an established wildlife habitat.	The Sustainability Appraisal only takes designated wildlife sites into account. This pool is not a designated wildlife site and so therefore has not been considered in the SA. No change proposed.	No
A0025	B001	Inclusion of facts needed from rep, a comprehensive commitment to protection, enhancement & wide buffering of this pond/wildlife area (as per paras 2.21, 2.31, DP12-3, DP12-7, 4.121 & 4.123 and reference to commitment to follow Shropshire Council's policies (Big Town Plan/SEN) and the government's 25 Year Plan to Protect & Enhance the Environment	The Sustainability Appraisal only takes designated wildlife sites into account. This pool is not a designated wildlife site and so therefore has not been considered in the SA. No change proposed.	No
A0025	B002	Site should be re-rated and should be poor and removed from consideration	The assessment of sites promoted between the Regulation 18 and Regulation 19 consultations has meant that some scores have changed as all sites are assessed in a settlement context. The Sustainability Appraisal only takes designated wildlife sites into account. This pool is not a designated wildlife site and so therefore has not been considered in the SA. No change proposed.	No
A0025	B003	Provide a re-assessment for SHR060 independently of SHR158/SHR161 & also recognise that SHR060 has two separate/distinct landscapes (the flat fields & the sloping fields down to the wildlife pond).	The landscape sensitivity (based on the Council's Landscape and Visual Sensitivity Stud) is the same for all three sites SHR060, SHR158 and SHR161. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0026	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Kinnerley Community Hub	Not Specified	No	Not Specified	The residential guideline for Kinnerley is too high, and Shropshire Council are not including past completions at Coly Anchor and Centenary Close which would take the guideline down once these are taken into account. The guideline is also not proportional to Kinnerley in terms of its size as well as when compared to other settlements' guideline in the Oswestry Place Plan area.
A0027	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	Not Specified	No	Not Specified	Draft Policy SP9's restriction on site size for infill development of no more than 0.1ha is not justified, effective or consistent with national policy. It creates inconsistencies in the draft Shropshire Local Plan, including draft Policies SP1 and SP5, as combined with the suggested limit on the number of dwellings on these plots (maximum of 3) this would mean a density of 30 dwellings per hectare (dph), whereas typical densities in Community Clusters are 12-18dph. It will not help deliver sustainable rural development, the low density forms of housing wanted by these communities and not support self-build housing or live/work units which require larger plots (even larger than 0.1ha), as it encourages higher-density development. It is also inflexible as it would result in the refusal of plots just over the threshold or containing well designed schemes of lower density. The lack of flexibility is not consistent with national policy which in para 127 of the National Planning Policy Framework (NPPF) states "plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change". Developers may artificially alter site boundaries to fit, sometimes leading to unnatural boundaries that do not respond to their context and clash with para 127 of the NPPF states good design is "sympathetic to local character and history, including the surrounding built environment and landscape setting" and which will, "establish or maintain a strong sense of place." Suggest increasing the plot size to 0.2ha and providing flexibility by using the term 'about' or set a size that is at the maximum end of the range of sizes that would be acceptable.
A0028	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Not Specified	Not Specified	Not Specified	It is difficult to connect M54/A5, A41/A464 and A4169/A458/A454 The Council's inclusion of the A4169 and A458 points to Much Wenlock as being part of the 'Eastern Belt Strategic Corridor'. It should be clear that this section of those two roads is unsuitable to accommodate the potential development pressures that will come with being identified as within a 'Strategic Corridor'.
A0029	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 Shrewsbury	Not Specified	Not Specified	Not Specified	There was concern about the level encouragement of developer direction rather than prescribing direction. Members continue to worry about the loss of the greenfield land as development is being driven to the edge of the town's development boundary. Some of our members have questioned the sustainability of the NWRR and the rationale in the development of large infrastructure projects like this. We fear that the sentiments of the Shrewsbury Test as defined in the Big Town Plan are watered down. Members feel there is a need for a Cycling & Walking Infrastructure Strategy. There is reference in the Local Plan to a Green Infrastructure Strategy but members are unaware of its existence.
A0030	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 West Felton	No	Not Specified	Not Specified	Not legally complaint as there has been no public consultation. The target of 25,400 is too high, other sites in West Felton have a better SA score, 60 new houses in West Felton will bring issues
A0031	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 Whitchurch WHT014	Not Specified	No	Not Specified	WHT014 should be retained as the area is already densely populated. The greenfield site is good for mental & physical health. Traffic problems exist here.
A0032	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Baschurch BNP035	No	No	Not Specified	Poor access for the numbers of proposed dwellings, our houses value will decrease, services/facilities etc. would not be able to sustain the numbers this site will bring



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0026	B001	The new residential guideline for Kinnerley as a Community Hub should be no more than 50 dwellings, not the proposed figure of 60 dwellings.	The completions at Coly Anchor and Centenary Close took place prior to 31st March 2016, and so are correctly not included in Shropshire Council's figures as they pre-date the plan period (i.e. before 31 March 2016). In terms of proportionality of development in Kinnerley - Shropshire Council takes due consideration on all settlements in terms of its housing guideline, looking at each settlements' opportunities and constraints. Kinnerley's percentage increase is comparable to several settlements in the Oswestry Place Plan area, including St Martins and West Felton. Each settlement is reviewed on a case-by-case basis, as every settlement has its own respective constraints and opportunities, and Kinnerley is seen as being a suitable settlement for the housing guideline given. Notably there are no allocations here, as it is expected the guideline will be reach through windfall development	No
A0027	B001	Amend the policy to remove the 0.1ha threshold for infill plots and replace it with a more threshold that is more responsive to the characteristics of Community Cluster settlements and more flexible, of 'about' 0.2ha.	Noted. It is considered that the definition of infill plots provided within draft Policy SP9 is appropriate. It provides a level of certainty to local communities and the development industry about the types of sites that are suitable for such development - in terms of location, size and capacity; ensures an effective use of land; but also allows for flexibility to density, design and layout, as the referenced site size (0.1ha or less) and capacity (maximum 3 dwellings) are maximums. As such it recognises the diverse nature of Community Clusters and the settlements within them. It should also be noted that whilst draft Policy SP9 provides the starting point for decisions on infill development within Community Clusters, the draft Shropshire Local Plan should be read as a whole. As such draft Policies SP1 and SP5 apply to such sites and there will inevitably be instances where a 0.1ha site is appropriate for 3 dwellings and others where it perhaps is not.	No
A0028	B001	Clarification on how M54/A5, A41/A464 and A4169/A458/A454 all connect is needed. A4169 and A458 should not be included.	The A458 between Shrewsbury and Bridgnorth and leading on to connect with the Black Country is undoubtedly a strategic corridor through Shropshire as part of the principal road network. The town of Much Wenlock would also appear to support this designation lying on the junction of the A458 with the A4169 linking to Ironbridge and the redevelopment of the site of the former power station, and with Telford, Shifnal on to the M54 corridor principally through Junction 4. Nevertheless, SP14 does require consideration of the sequential preference for development in criterion 3 and the need to consider the sustainability of development proposals and their proposed location in criterion 4. It is considered that the matters raised in relation to the suitability of Much Wenlock to perform as a location for development on the A458 strategic corridor are addressed in SP14 which is considered to be consistent, sufficiently flexible and positively contribute to the achievement of the Local Plan strategy.	No
A0029	B001	N/A	The comments of Shrewsbury Town Council are noted, and it is recognised that they do not raise any objection to the legality and robustness of the Local Plan, rather there is a genuine desire for the Town Council to continue to be actively engaged in a number of ongoing Planning matters.	No
A0030	B001	Decrease the housing for the county, and have smaller sites in West Felton, rather than one large one	Contrary to this response, there have been numerous public consultations over several years for residents to express their views. A robust approach was taken during site assessments which deemed that the allocation was suitable. 60 houses is considered appropriate for this settlement and is in a good location given that it extends the recent development across to the east.	No
A0031	B001	Remove WHT014 as an allocation.	Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0032	B001	Remove BNP035 - infill can accommodate these numbers	Shropshire Council considers that the proposed development strategy for Baschurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. Proposed site allocations have been informed by a robust and proportionate site assessment process.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0033	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Bridgnorth BRD030	Not Specified	No	Not Specified	The Sustainability Appraisal (SA) for BRD030 is incorrect, as it omits a (-) for Criteria 15 (site wholly/partly classified as high landscape sensitivity for residential). If this minus is added, the site performs poorly within the SA. BRD030 is unsound and contravenes other proposed strategic policies as: -It is separated from the built form of Bridgnorth by the A458, to be sustainable pedestrian and cyclist links between them are essential, but there are no confirmed methods of providing them and it is considered impossible. -There is no information on how BRD030 can be integrated into the town and it is considered it would create a separate community. -Its development will substantially increase traffic volumes into Bridgnorth due to segregation by the A458, and through Bridgnorth Low Town due to commuters to Stanmore Business Park, Telford or Wolverhampton. -It is on a high point so widely visible, separated from Bridgnorth by the A458, would destroy approaches to Bridgnorth from Ludlow and represent a scar on the landscape. -It is in proximity of a Conservation Area at Bridgwalton which is not recognised.
A0034	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Longden	Not Specified	No	No	Methodology used within the Hierarchy of Settlements to identify Longden as a Community Hub is not fit for purpose. Particularly with regard to the lack of 'weighting'. Identification of Longden as a Community Hub disregards local opinion. Little reference in the draft Shropshire Local Plan to those with disabilities in Longden.
A0035	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2 Bucknell BKL008a	No	No	No	Not legally as brownfield sites are not being considered first as per NPPF para 118c. Unsound as site was removed then reintroduced but its implied delivery contradicts App 7. Fails DtC as there has been no cooperation with the Bucknell residents.
A0036	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Not Specified	Not Specified	Not Specified	The draft Shropshire Local Plan is too long and difficult to decipher in parts. Some policies are too long, overly prescriptive and in some cases conflicting. The draft Shropshire Local Plan references supplementary documents, including ones containing criteria which development proposals would need to be assessed against. Ensure conformity with recent changes to planning legislation/regulations including the changes to the Use Classes Order.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0033	B001	Amend the Sustainability Appraisal for BRD030. Remove BRD030 from the plan. Stanmore Garden Village represents a reasonable alternative to the development of this site.	The landscape and visual sensitivity scoring within the Sustainability Appraisal (SA) is based on the Landscape and Visual Sensitivity Assessment undertaken to inform the Shropshire Local Plan Review. This Assessment concludes that the parcel which covers the majority of BRD030 has medium landscape and visual sensitivity to residential development and medium-high landscape and visual sensitivity to employment - a portion of the site was beyond the area assessed. As such it is correctly scored within both the residential and employment SA. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations and proposed safeguarded land.	No
A0034	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village. Recognise needs of those with disabilities, particularly in Longden.	Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden. The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is important that the needs of all groups within the community, including those with disability are met. The housing need of groups within the community are considered within the Strategic Housing Market Assessment (SHMA), which forms part of the evidence base and has informed draft Policies within the draft Shropshire Local Plan. Draft Policies also address such issues as high-quality design and health and wellbeing.	No
A0035	B001	Remove BKL008a and all references to it. Alternatively, as a less satisfactory alternative, a legally binding commitment be given that BKL008a will not be designated as a site until at least 2035-2038 as per appendix 7, or until BUCK001 has been completely developed. Paragraph 5.38 to include wording to that effect	Bucknell is appropriately designated as a Community Hub on the size of the settlement and the services and facilities it provides. Shropshire Council considers that the proposed development strategy for Bucknell and the existing and proposed allocations which contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Proposed site allocations have been informed by a proportionate and robust site assessment process. The settlement strategy for Bucknell, which is clearly explained in the Draft Local Plan, was consistently presented in consultations during its preparation. New housing allocation BKL008a for 20 dwellings was identified in the Preferred Sites consultation in 2018 and presented in subsequent consultations. Site BKL008a will supplement the saved SAMDev brownfield housing and employment allocation at BUCK001/BKL011 which already forms part of the housing land supply in Bucknell. The Council considered local representations recommending a further extension to BUCK001 but this site was extended to 70 dwellings in the SAMDev Plan and a further extension may affect its viability in the village of Bucknell. Further site options in Bucknell are influenced by the Area of Outstanding Natural Beauty and the Bucknell Conservation Area that cover the centre and west of the village. Site BKL008a on the east of the village lies beyond these two protective designations and provides an appropriate location for further modest housing development to meet a revised housing requirement for 110 dwellings which represents a modest increase from the previous figure of 100 dwellings. The delivery of BUCK001 and BKL008a is currently affected by the protection of the River Clun Special Area of Conservation (SAC) due to the water quality in the river. Site BKL008a could be delivered quickly as a smaller, greenfield allocation to refresh the housing market when the issues connected with the protection of the SAC are resolved but currently these issues will defer the delivery of new housing in Bucknell.	No
A0036	B001	The plan (policies and supporting text) would benefit from being shortened, to ensure that it focusses on its key objectives and provides a positive framework to encourage future development. References to other supplementary documents should be removed or their information included in the Plan itself.	Noted. The draft Shropshire Local Plan is considered to provide a positive vision for the future of Shropshire; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings. The draft Shropshire Local Plan has been informed by effective and proportionate engagement, including use of digital tools. Draft policies are considered succinct, clearly written, complementary and effective. They are considered positive and aspirational but deliverable. They have been prepared with the objective of achieving sustainable development. They avoid unnecessary duplication and provide certainty to decision makers, communities and the development industry. Supplementary documents are proposed/referenced where considered appropriate to add further detail to the policies in the draft Shropshire Local Plan. This approach also avoids unnecessary duplication. References to outdated use classes to be amended (in Policy DP9).	Yes

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0036	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	Of the total housing requirement approximately 25% (7,700) affordables will be provided during the local plan period. It is unclear how this total has been calculated and whether it is realistic given that Policy DP3 – Provision of Affordable Housing seeks a range of 10-20% provision.
A0036	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	Not Specified	Not Specified	Draft Policy DP1 largely reflect the findings of the Council's Strategic Housing Market Assessment (SHMA). However, criterion 6 requires (on sites of 50 or more dwellings) the provision of an appropriate range of specialist housing to meet the diverse needs of older people such as age restricted general market housing, retirement living or sheltered housing, extra care housing and residential care/nursing homes. Whilst such provision is an important component of the residential market, no justification or evidence document has been provided for such a requirement.
A0036	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Not Specified	Not Specified	Not Specified	Policy DP2 requires the provision of 10% of plots on residential schemes (over 5 or more dwellings) to be provided as serviced plots for Self-Build and Custom-Build developers where there is an identified need on the Self-Build Register. No justification is provided for this requirement and there is no indication within the policy as to how developments that don't provide serviced plots will be considered and assessed. As a result, the policy cannot be justified. Whilst demand for Self-Build and Custom Build properties is increasing, consider these are best provided on dedicated plots rather than as part larger development schemes.
A0036	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 Shrewsbury SHR145	Not Specified	Not Specified	Not Specified	Support identification of Shrewsbury as the primary focus for new development in Shropshire, this will support the objective of maintaining the towns role as the Strategic Centre of Shropshire and develop it into a sub-regional centre. The town is well established to manage new development (housing, employment, retail, leisure and necessary infrastructure improvements). Support proposed allocation of SHR145 as it represents a sustainable location for housing, with good access to services and facilities, and will contribute towards meeting the objectives of the draft Shropshire Local Plan by supporting housing growth in Shrewsbury. Site is available, viable and deliverable (demonstrated through a recent Planning Application that was refused but established that there are no technical reasons why the site cannot be developed). However, consider minor amendments to proposed site guidelines for SHR145 should be made, to provide greater clarity, in relation to access; mature trees, hedgerows and priority habitats; and noise. Specific minor amendments proposed documented within representation.
A0036	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 Shrewsbury Proposals Map	Not Specified	Not Specified	Not Specified	Generally support proposed amendments to the development boundary for Shrewsbury, but consider that they should be extended to includes Meole Brace Park and Ride. This seems a natural extension with the A5 acting as a defensible boundary against urban sprawl.
A0037	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	Only 90 dwellings as a guideline for Cross Houses – no explanation for reduction from 130 (at 2018 Preferred Options). Low guideline will restrict delivery in a sustainable village.
A0037	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S8.1 Ellesmere Policy Map	Not Specified	Not Specified	Not Specified	The Policies Map for Ellesmere is bizarre, excluding half of a current development site subject to Planning Permissions 14/00822/OUT / 15/05415/REM. This site and other existing development sites should be incorporated into the towns development boundary.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0036	B002	The 25% figure quoted in Policy SP2 cannot be justified and should be reduced accordingly	<p>Noted. In Shropshire delivery of affordable housing is a key priority, as such it is considered appropriate to seek to delivery around 7,700 affordable dwellings (equating to around 25% of the total housing requirement) during the plan period from 2016 to 2038. This is considered positive and aspirational but deliverable.</p> <p>Past trends on affordable housing delivery, summarised within the Strategic Housing Market Assessment (SHMA), indicate that over the last 5 years, affordable housing completions averaged around 21% of total housing completions, based on generally comparable affordable housing requirements from market housing schemes.</p> <p>It should be noted that affordable housing contributions from open market schemes represent only one mechanism for securing affordable housing. Other such mechanisms, as identified within the proposed policies of the draft Shropshire Local Plan, include exceptions schemes, entry-level exceptions sites, single plot exceptions sites and cross-subsidy exception schemes.</p>	No
A0036	B003	Criterion 6 should be deleted as it cannot be justified. The provision of accommodation for the elderly should be market led and justified at the development management/application stage based on a demonstrable need for such a facility.	<p>Noted. The National Planning Policy Framework (NPPF) specifies that housing needed for different groups in the community should be assessed and reflected in planning policies, this includes the needs of older people. The Strategic Housing Market Assessment (SHMA) indicates that growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the proposed Local Plan period from 2016 to 2038. It also identifies a specific need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision. In order to ensure the needs of older people are met it is considered that there is a need to provide accessible and wheelchair user dwellings and an appropriate range of specialist housing designed to meet the diverse needs of older people.</p> <p>With regard to specialist designed housing (for older people and those with disabilities), it is recognised that sites of 50 or more dwellings will be diverse in nature. It is for this reason that a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors.</p>	No
A0036	B004	Remove the requirement for 10% of plots on residential schemes (over 5 or more dwellings) to be provided as serviced plots for Self-Build and Custom-Build developers.	<p>Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position.</p>	No
A0036	B005	Amend proposed site guidelines for SHR145 as documented within representation.	<p>Noted. The proposed site guidelines for SHR145 are considered appropriate and provide clarity to the decision maker, local community and development industry.</p>	No
A0036	B006	Include the Meole Brace Park and Ride site within the proposed development boundary.	<p>Noted. The proposed development boundary for Shrewsbury is considered appropriate. It is not considered that the Meole Brace Park and Ride needs to be included within the development boundary to facilitate its continued operation.</p>	No
A0037	B001	Increase housing guideline for Cross Houses back to 130 and include CSH006.	<p>Cross Houses is appropriately designated as a Community Hub on the size of the settlement and the services and facilities it provides. The settlement strategy for Cross Houses is clearly explained in the Draft Local Plan. Cross Houses is a modest sized settlement which experiences significant development pressures due to its location to the south-east of Shrewsbury. Larger scale housing development has already been permitted in Cross Houses as a result of previous housing land supply issues in the County. This occurred even though Cross Houses was designated as a Countryside settlement where housing development is strictly controlled. The proposed change in the status of Cross Houses to become a Hub settlement did include a proposal for a further housing site but this has not been allocated for development due to unresolved access constraints. An alternative allocation for housing development has not been identified in Cross Houses so the village and its community may assimilate the significant housing development currently being delivered in the village. This will also relieve the pressure from further development on two separate Ramsar sites located close to Cross Houses. The preferred strategy for Cross Houses as a Hub settlement is therefore for a slightly lower scale of housing development to be delivered on small scale infilling or redevelopment sites within the village.</p>	No
A0037	B002	All existing developments should be included within the development boundary (in particular 14/00822/OUT / 15/05415/REM).	<p>Noted. It is not proposed that development boundaries will reflect the extent of all extant Planning Permissions around a town. Rather, the purpose of a development boundary is to define a logical area, based on the built form of a settlement and any proposed allocations, within which certain policies apply. With regard to Planning Permission 14/00822/OUT / 15/05415/REM, when defining the development boundary for Ellesmere it was considered that significant progress had been made on the northern element of the scheme to the extent that it was considered to constitute part of the built form of the settlement, this was not the case for the southern element of the site. This of course does not impact on the ability of Planning Permission 14/00822/OUT / 15/05415/REM from being implemented.</p> <p>Shropshire Council considers that the proposed development boundary for Ellesmere is appropriate.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0037	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S8.1 Ellesmere	Not Specified	No	Not Specified	The proposed development strategy for Ellesmere, to delivery 800 dwellings through proposed allocations and windfall development, fails the 'effective' test of soundness. This is because: -The windfall allowance cannot be accommodated within the development boundary, which is closely drawn around the town. Affordable exception sites will not deliver a significant contribution as they have not in the past and proposed policies are more restrictive than current ones. -It is considered that the proposed allocations are unlikely to deliver 170 dwellings by the end of the plan period. They are also concentrated in the south-west of Ellesmere, reducing choice and competition. This location has also been the focus for allocations since 1986 and timescales/delivery rates on all sites have been slow. Site ELL007 should be allocated for development to increase housing land supply in Ellesmere. There are technical solutions to constraints to the access being located in flood zone 2/3 and this was accepted in relation to current allocation ELL003. This site would have capacity for circa 22 dwellings, be delivered quickly, deliver multiple benefits (documented in representation), and help achieve the proposed windfall allowance for Ellesmere. Proposed site guidelines provided within the representation.
A0037	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S8.2 Cockshutt	Not Specified	No	Not Specified	Consider demotion of Cockshutt from Community Hub to Community Cluster fails the 'justified' test of soundness as no justification is provided in the Plan for the proposed change in status. The only change in the village's circumstances is the closure of its convenience store which has reduced its score in the Council's Hierarchy of Settlements' (HoS) from 50 points in 2017 to 46 points in 2020. The threshold for a Community Hub is deemed by the Council to be 48 points, but no justification is given for this arbitrary cut-off figure. The HoS (August 2020) is inaccurate, as many villages have lost services as a result of Covid 19. As such it no longer provides a sound justification for deciding the status of a settlement. The HoS (August 2020) is also inaccurate in relation to Cockshutt, as the settlement has amenity green space. The HoS approach is deeply flawed because it ignores the size of rural settlements, using it only within the screening of settlements. Cockshutt has a population much larger than some proposed Community Hubs. Suggest specific points applied for settlement size (1 per 100 people) to account for settlement size. Cockshutt has previously been recognised as a suitable settlement for development and removing Community Hub status will lead to a loss of services and facilities, contrary to aspirations of improving sustainability. Cockshutt has reliably delivered housing as demonstrated within the Council's latest Five Year Housing Land Supply Statement (base date 31st March 2019).
A0037	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	No	The proposed housing requirement of around 1,400 dwellings per annum does not meet the Duty to Co-operate and fails the 'positively prepared' and 'consistent with national policy' tests of soundness. -The proposed housing requirement amounts to a reduction in the amount of housing in the adopted Core Strategy, which planned for 1,530 dwellings per annum from 2021, as such it fails to significantly boost the supply of housing as sought by para 59 of the National Planning Policy Framework (NPPF). -The proposed housing requirement is also less than the average annual growth forecasts in the 2018-based sub-national household projections (1,656 per annum). As such it will constrain growth, rather than meet needs. -Recognise the proposed housing requirement exceeds Local Housing Need, calculated using the standard methodology, but para 60 of the NPPF states need can be calculated differently where exceptional circumstances justify. Such circumstances exist in Shropshire given the difference between the 2014-based SNHP (which inform the standard methodology and show 19.2% growth over the proposed Local Plan period) and the 2018-based SNHP (which show 26.9% growth over the proposed Local Plan period). More sensible to utilise the 2018-based SNHP for calculating Local Housing Need. -Covid 19 further increases rates of growth, with increased demand for housing in Shropshire during 2020 and shifts towards home working increasing the attractiveness of Shropshire. -Affordability ratios in Shropshire exceeds that for West Midlands and England. Rapid house price rises in Shropshire during 2020 are expected to worsen this ratio. Under-delivery during the proposed Local Plan period will greatly worsen affordability of housing. -The Association of Black Country Authorities (ABCA) have requested support achieving unmet cross-boundary need for 26,000 homes over the period to 2038. Shropshire is less constrained than ABCA yet only proposed a 1,500 dwelling contribution. This fails consistency with para 60 of the NPPF which requires any needs that cannot be met within neighbouring areas to be taking into account in establishing a housing requirement. No Statement of Common Ground with ABCA has been published. It is contrary to para 27 of the NPPF to wait until submission to publish such Statements.
A0037	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	No	Not Specified	Concerned draft Policy SP7 fails the 'justified', 'effective' and 'consistent with national policy' soundness tests. -Draft Policy SP7 makes residential development guidelines significant policy considerations, and states that whilst not ceilings to development, going beyond them by too great a degree could result in unsustainable development. However, the Council has presented no evidence that residential development guidelines represent sustainable levels of development or that higher levels of development represent unsustainable levels, taking into account reasonable alternatives. -Applying settlement guidelines which restrict development runs counter to para 59 of the National Planning Policy Framework (NPPF) which seeks to significantly boost the supply of homes and para 60 and 73 of the NPPF regarding housing requirements and land supply being minimums. -Concerned that draft Policy SP7 in combination with draft Policy DP1 will adversely impact on housing delivery. Draft Policy DP1 seeks a higher proportion of smaller houses, effectively requiring more units on a site to achieve the same saleable floorspace. Viability in Shropshire is finely balanced in many parts of the County (as demonstrated within the Shropshire Viability Assessment), so saleable floorspace must be maximised to ensure viability. So, it is difficult to achieve the mix sought under draft Policy DP1 if doing so exceeds the settlements residential guidelines. As such draft Policy SP7 in combination with draft Policy DP1 could render allocations undeliverable and create deliverability issues across the County.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0037	B003	The development boundary should be enlarged to include the highly deliverable site ELL007, which would represent an additional phase of an ongoing development. This site would have capacity for circa 22 dwellings, be delivered quickly and help achieve the proposed windfall allowance for Ellesmere. Proposed site guidelines provided within the representation.	Shropshire Council considers that the proposed development strategy for Ellesmere and the existing commitments (including the existing allocations), proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken, including consideration of this promoted site.	No
A0037	B004	Cockshutt should be identified as a Community Hub, with a residential guideline of around 80 dwellings (based on a growth rate of 1% and recognising that it is a sustainable rural settlement which serves as a focus for growth for its surrounding rural hinterland). Site CCT010 should be allocated for 40 dwellings to support delivery of this proposed residential guideline and meet the villages long term growth through a comprehensive well-thought out development. Proposed site guidelines and benefits to the community identified within the representation.	Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cockshutt. As such it is considered appropriate that Cockshutt is not identified as a proposed Community Hub. Identification of Amenity Green Space is primarily informed by the Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Within the draft Shropshire Local Plan, Cockshutt is proposed to be identified as a Community Cluster. Community Clusters consist of individual or groups of small rural settlements of varying function but with aspirations to maintain or enhance their sustainability through modest levels of appropriate development. As such appropriate development is still expected to occur within such settlements. Draft Policy SP9 identifies the forms of residential development that are appropriate within Community Clusters, supported by other relevant draft Policies.	No
A0037	B005	Increase the proposed housing requirement to 50,600 dwellings (2,300 dwellings per annum) rounded up from 50,468 dwellings (2,294 dwellings per annum), calculated as follows: -Match the 2018-based sub-national household projection (SNHP) for average growth over the plan period of 1,656 dwellings per annum; and -Add the standard method's adjustment figure based on the 2019 affordability ratio of 7.97, namely an adjustment of x0.248, which increases the figure by 24.8% or 411 dwellings per annum to 2,067 dwellings per annum; and -Add 5,000 dwellings (equivalent to 227 dwellings per annum) as Shropshire's contribution to meet unmet need from neighbouring areas.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Government has recently consulted upon potential changes to the methodology for calculating LHN, including the potential use of the 2018-based sub-national household projections (SNHP). As a result of this consultation Government determined that it was most appropriate to retain the use of the 2014-based SNHP for this calculation. Furthermore, in responding to this Consultation, Shropshire Council indicated its significant concerns regarding the 2018-based SNHP, particularly with regard to their reliance on the 2018-based sub-national population projections (SNPP) which utilised only 2-years of internal migration data in their formulation. With regard to the adopted Local Plan housing requirement, it is important to note that this is an aspirational but achievable housing requirement, which exceeded past housing need calculations and continues to exceed calculations of LHN using Government's standard methodology. Furthermore, the housing requirement was phased into 5-year time periods (the average housing requirement over the total period covered by the adopted Local Plan is some 1,375 dwellings per annum). The draft Shropshire Local Plan also proposes an aspirational, but achievable housing requirement, which averages some 1,400 dwellings per annum, which meets identified LHN and provides an opportunity to respond/support other objectives as referenced above. Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. It is considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.	No
A0037	B006	Draft Policy SP7 should reflect the conclusions of the Shropshire Viability Study. Consent should be granted for 120-130% of the residential guideline in order to deliver 100% of housing needs. Meaning a 20-30% non-delivery allowance being applied. Draft Policy SP7 should be modified to: -Under point 4, remove reference to 'significant' in relation to residential development guidelines. -Under point 3: recognise the need to include a 20% non-delivery allowance in relation to outstanding commitments; reference the delivery of the housing mix in draft Policy DP1; and reference the viability and delivery of the Plans allocated sites.	Noted. The purpose of the draft Shropshire Local Plan is to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations. However, draft Policy SP7 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such, draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings than the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline. As such, Shropshire Council considers that draft Policy SP7 is justified, effective and consistent with national policy. It is also considered that draft Policy DP1 is complementary in that it ensures the effective use of land and that the forms of housing delivered are responsive to the needs of local communities.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0037	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	<p>Section 1f of draft Policy SP8 fails the 'justified', 'positively prepared', 'effective' and 'consistent with national policy' tests of soundness.</p> <p>-Draft Policy SP8 confirms "Community Hubs are considered significant rural service centres and the focus for development within the rural area." However section 1f turns them from sustainable settlements where development is appropriate, to locations where development is refused if residential guidelines are exceeded. Inadequate evidence and no justification is provided for this approach. Also, no clear evidence or justification is provided for proposed guidelines, differences between each proposed Community Hub, and the alternative of considering whether development is sustainable has not been considered (as proposed to be applied within Community Clusters).</p> <p>-2018-based sub-national household projections (SNHP) growth forecasts equate to 1.22% growth per annum. This should be the minimum level of growth for each proposed Community Hub if they are to be the focus for rural development, but almost all proposed residential guidelines are below this figure.</p> <p>-Section 1f of draft Policy SP8 will disproportionately affect proposed Community Hubs with effective housing delivery. This places extra pressure on less favourable locations, with far weaker viability. The Shropshire Viability Study indicates some parts of Shropshire have lower viability than others, highlighting potential deliverability issues. Draft Policy DP8 therefore increases the risk of failing to meet housing need.</p> <p>-Constraining development in successful Community Hubs will hold back development that improvements social and economic sustainability.</p> <p>-Section 1f of draft Policy SP8 makes proposed residential development guidelines ceilings to development, contrary to para 59 of the National Planning Policy Framework (NPPF) regarding significantly boosting the supply of homes.</p> <p>-Section 1f repeats draft Policy SP7 and is therefore unnecessary.</p>
A0038	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Baschurch BNP024	Yes	No	Yes	Guideline for BNP024 is too low, particularly when compared to adjoining site.
A0039	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S12.1 Minsterley MIN018	Yes	No	Yes	Guideline for this site is too low, particularly when compared to adjoining site.
A0040	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP7	Not Specified	No	Not Specified	Only a very limited number of exception sites are coming forward as evidenced by the low delivery of exception sites in Shropshire in the past few years. To increase delivery requires a significant change to the current situation and that means providing landowners with more incentive to make land available for affordable housing.
A0040	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Not Specified	No	Not Specified	<p>Draft Policy SP2 addresses mostly only self-build development on larger sites and provides no real support for self-build development on small plots, where the bulk of self-build development has occurred. As such it is not effective.</p> <p>Para 4.46 of the draft Shropshire Local Plan estimates that around 9% of Local Housing Need is for self-build and custom-build plots. Rural areas are well placed to meet this need due to strong market demand.</p> <p>As such, small-scale self-build and custom-build development adjoining the development boundaries of proposed Community Hubs should be allowed, this is consistent with para 78 of the National Planning Policy Framework (NPPF). Draft Policy DP10 should be updated for consistency.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0037	B007	Remove para 1f of draft Policy SP8 entirely. If settlement residential guidelines are retained, they should be referenced as minimum figures.	Noted. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The purpose of the draft Shropshire Local Plan to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines for proposed Community Hubs have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations. Para 1f of Draft Policy SP8 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such where these residential development guidelines are to be exceeded it cross-references draft Policy SP7. Draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.	No
A0038	B001	Increase the site's housing guideline to 60.	Shropshire Council considers the proposed capacity of BNP024 is appropriate. It should be noted that Para 4 of Draft Policy S16.2 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.	No
A0039	B001	Increase the site's housing guideline to 30 (and overall Minsterley/Pontesbury by 30 to 185)	Shropshire Council considers that the proposed development strategy for Minsterley & Pontesbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). Shropshire Council considers the proposed capacity of MIN018 is appropriate. It should be noted that Para 4 of Draft Policy S12.1 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.	No
A0040	B001	Remove: "and that an affordable exception scheme is unviable," from DP7 1a	Shropshire Council consider the requirements identified within para 1.a. of draft Policy DP7 are appropriate. The policy is intended as a delivery mechanism for affordable housing and not the provision of open market dwellings. Requirements respond to the significant affordable housing need identified in Shropshire and reflect the expectation that affordable exception schemes are the first delivery mechanism considered. Inclusion of a specific policy in the Draft Plan provides greater clarity for the development industry to bring appropriate schemes forward.	No
A0040	B002	Para 1 of draft Policy DP2 should include "and small-scale self-build and custom-build of up to 3 dwellings on sustainable sites adjoining settlement development boundaries,". The explanation to Policy DP2 should include "In its decision-making, the Council will consider the provision of self-build plots as a positive benefit of development in the planning balance when applying policy SP7 (Managing Housing Development)." Draft Policy SP10, should be amended for consistency to state under section 3 "g. Self-build and custom-build housing on suitable sites adjoining Community Hub settlements."	Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. It is considered that the proposed approach within draft Policy DP2, alongside other relevant policies relating to residential development in the draft Shropshire Local Plan, will effectively meet the diverse need for self-build and custom-build development. It is important to note that open market self-build and custom-build development is a form of open market residential development. It is also important to note that Shropshire is already delivering significant volumes of self-build plots, using a policy approach which is generally consistent in relation to small sites, whilst the proposed approach in relation to large sites creates an opportunity to complement this provision both in terms of numbers and types of plots, again to effectively meet the diverse need for self-build and custom-build development.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0040	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	<p>Section 1f of draft Policy SP8 fails the 'justified', 'positively prepared', 'effective' and 'consistent with national policy' tests of soundness.</p> <p>-Draft Policy SP8 confirms "Community Hubs are considered significant rural service centres and the focus for development within the rural area." However section 1f turns them from sustainable settlements where development is appropriate, to locations where development is refused if residential guidelines are exceeded. Inadequate evidence and no justification is provided for this approach. Also, no clear evidence or justification is provided for proposed guidelines, differences between each proposed Community Hub, and the alternative of considering whether development is sustainable has not been considered (as proposed to be applied within Community Clusters).</p> <p>-2018-based sub-national household projections (SNHP) growth forecasts equate to 1.22% growth per annum. This should be the minimum level of growth for each proposed Community Hub if they are to be the focus for rural development, but almost all proposed residential guidelines are below this figure.</p> <p>-Section 1f of draft Policy SP8 will disproportionately affect proposed Community Hubs with effective housing delivery. This places extra pressure on less favourable locations, with far weaker viability. The Shropshire Viability Study indicates some parts of Shropshire have lower viability than others, highlighting potential deliverability issues. Draft Policy DP8 therefore increases the risk of failing to meet housing need.</p> <p>-Constraining development in successful Community Hubs will hold back development that improvements social and economic sustainability.</p> <p>-Section 1f of draft Policy SP8 makes proposed residential development guidelines ceilings to development, contrary to para 59 of the National Planning Policy Framework (NPPF) regarding significantly boosting the supply of homes.</p> <p>-Section 1f repeats draft Policy SP7 and is therefore unnecessary.</p>
A0040	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 St Martins	Not Specified	No	Not Specified	St. Martin's residential guideline of 'around 355 dwellings' is unjustifiably low.
A0041	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage CES005	Yes	Yes	Yes	Support housing allocation CES005 in Cressage
A0042	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S9.1 Highley	Not Specified	No	Not Specified	<p>Support proposed allocation of site HNN016 for around 100 dwellings. This is a highly sustainable and deliverable site (see Appendix to representation).</p> <p>Concerned the development guideline for Highley is too low and is therefore 'not justified', 'not positively prepared' and 'not consistent with national policy'. There is no evidence to justify the proposed housing guideline, equivalent to 11.4 dwellings per annum. Past delivery rates equate to 14 dwellings per annum (2006-2019, including a period impacted by an economic crash) and given Government objectives to significantly boost housing supply as per para 59 of the National Planning Policy Framework (NPPF), Highley should be aiming for higher rates than have previously been delivered. Applying 2018-based sub-national household projections (SNH) which indicate growth of 22.7% over the proposed Local Plan period, to Highley's dwellings, 332 dwellings would be required.</p>
A0043	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 Shrewsbury SHR054a	Not Specified	No	Not Specified	The Guideline figure fails the 'consistent with national policy' and 'justified' test.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0040	B003	Remove para 1f of draft Policy SP8 entirely. If settlement residential guidelines are retained, they should be referenced as minimum figures.	Noted. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The purpose of the draft Shropshire Local Plan to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines for proposed Community Hubs have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations. Para 1f of Draft Policy SP8 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such where these residential development guidelines are to be exceeded it cross-references draft Policy SP7. Draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.	No
A0040	B004	SMH037 should be allocated in addition to the preferred allocation, for around 65 dwellings	Shropshire Council undertook a robust site assessment exercise and it was considered that site SMH037 was "...compromised by poor highway access and by limited accessibility to local services. Better sites available." It is therefore considered that the preferred allocations are suitable alongside any windfall development to meet the housing target of the settlement	No
A0041	B001	None	Shropshire Council welcomes the support for the designation of Cressage as a Community Hub and for the allocation and delivery of housing site CES005 adjoining The Vicarage on A458. This support is welcomed as evidence of the soundness of the Draft Local Plan.	No
A0042	B001	Amend the proposed residential development guideline for Highley from 250 to 330 dwellings.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers that the proposed development strategy for Highley and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities.	No
A0043	B001	The housing guideline for the site should increase from 60 to 85 dwellings	Noted . it is considered the current housing guideline, which provides an approximate figure for in-site delivery, should be maintained and is justified given it has been subject to the site assessment at this level. It is, however, recognised that the planning application process will provide additional opportunity for an applicant to justify a potential increase in housing on the site as material considerations.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0044	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Yes	No	Yes	Clive should not be a Hub - the bowling green is private and the shop has closed, meaning Clive no longer meets the points required for Hub Status
A0045	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Longden	Not Specified	No	Not Specified	<p>Longden is much smaller than any of the other Proposed Community Hubs. Development in a settlement without adequate public transport links and local employment is unsustainable and contradicts the national net zero carbon target.</p> <p>Query whether the methodology within the Hierarchy of Settlements has been appropriately scrutinised.</p> <p>Why has an Infrastructure Plan and up-to-date Local Transport Plan not been prepared?</p> <p>Refers to Longden Village Action Group (LVAG) letter at Reg 18 and Reg 19 stages of consultation.</p> <p>Does not understand why some proposed development sites are included when they have been subject to appeals and previously rejected, particularly LGN016 and LGN002.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0044	B001	Correct the scoring and remove the Hub status for Clive	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0045	B001	<p>The Hierarchy of Settlements should include "weighting," to reflect the size of infrastructure, services and employment opportunities.</p> <p>The draft Shropshire Plan should have been paused earlier to assess issues raised by communities.</p>	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p> <p>In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0046	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Longden	Not Specified	No	Not Specified	Disagree with the methodology utilised within the Hierarchy of Settlements as applied to Longden. Refers to Longden Village Action Group (LVAG) letter. Does not understand why some proposed development sites are included when they have been subject to appeals and previously rejected, particularly LGN016 and LGN002.
A0047	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Longden	Not Specified	No	Not Specified	Disagree with the methodology utilised within the Hierarchy of Settlements as applied to Longden. Disagree that Longden should be identified as a proposed Community Hub. Refers to Longden Village Action Group (LVAG) letter. Does not understand why some proposed development sites are included when they have been subject to appeals and previously rejected, particularly LGN016 and LGN002.
A0048	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Longden	Not Specified	No	Not Specified	Disagree with the methodology utilised within the Hierarchy of Settlements as applied to Longden. Refers to Longden Village Action Group (LVAG) letter. Does not understand why some proposed development sites are included when they have been subject to appeals and previously rejected, particularly LGN016 and LGN002.
A0049	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	Yes	No	Yes	The plan has little consideration of the recently declared climate emergency and fails to deliver a plan for the sustainable development needed for the people of Shropshire
A0050	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Shrewsbury Hubs: Longden	Not Specified	No	Not Specified	1. Disagree with Hierarchy of Settlements as applied to Longden. 2. Disagree with sites which have been included despite appeals on these sites being rejected (016 & 022).
A0051	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Shrewsbury Hubs: Longden	Not Specified	No	Not Specified	Disagree with Hierarchy of Settlements as applied to Longden. Disagree with sites which have been included despite appeals on these sites being rejected (016 & 022).

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0046	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden. However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach. In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.	No
A0047	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden. However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach. In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.	No
A0048	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden. However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach. In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.	No
A0049	B001	I would suggest a paragraph in every section detailing how the proposed developments will be carbon neutral and have a net gain for biodiversity	Shropshire Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation and does not propose any changes.	No
A0050	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden. As such it is considered appropriate for Longden to be identified as a proposed Community Hub. However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.	No
A0051	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden. However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach. In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0052	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Shrewsbury Hubs: Longden	Not Specified	No	Not Specified	Disagree with Hierarchy of Settlements as applied to Longden. Disagree with sites which have been included despite appeals on these sites being rejected (016 & 022).
A0053	B001	Sustainability Appraisal	S3. Bridgnorth Place Plan Area	Yes	No	Yes	Need to reduce carbon emissions and importance of linkage of green infrastructure & pedestrian and cycle access is recognised in the document but satisfactory extensive linked route provision required before development to achieve realistic alternative to car use. Black Country residential needs should be met through re- use of unused office buildings.
A0053	B002	Habitats Regulations Assessment	Habitats Regulations Assessment S3. Bridgnorth Place Plan Area -BRD026	No	No	No	Landscape and visual assessment for BRD026 not undertaken. BRD026 should be registered a Brownfield land with potential ecological value. Poor air quality issue recognised but no identification of source or plan to address it.
A0054	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - ALV09	No	No	No	The Plan does not take into account the approved Development Plan. Site ALV009 is in Green Belt and has previously been rejected by the Parish Council. Sufficient Green Belt Land is already identified in the Plan for 100 houses. There have been significant levels of recent housing development & known intentions to seek planning permission for additional. Views/complaints of residents & Parish Council are not properly considered by Shropshire Council
A0055	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Wem Hubs : Clive	No	Not Specified	Not Specified	Points allotted for services no longer available in Clive -bowling green is private and shop closed . Changes are not Covid related.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0052	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden. However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach. In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.	No
A0053	B001	1.Protection of agricultural and forested areas from development required 2.Identify roads as freight free 3.Link communities with cycle routes and implement maintenance programme for all paths	These matters cannot be addressed by the Sustainability Appraisal. No change proposed.	No
A0053	B002	Carry out and publish the landscape and visual assessment for BRD026. Address poor air quality issue.	Site BRD026 is an existing allocation within the adopted Local Plan. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means.	No
A0054	B001	Remove ALV009 from Plan	Local Plans must be regularly reviewed and an the early review of the adopted Plan (SAMDev DPD) was required. The Draft Local Plan does not need to replicate the adopted plan but does needs to be in line national policy. As part of the review process housing and employment land requirements over the whole Plan period and beyond in the case of Green Belt review, must be considered. Alveley as a Community Hub is a sustainable location and focus for development in the rural area. Any housing delivery and existing commitments, together with constraints, are taken into account as part of the overall housing requirement and site assessments are carried out to consider the suitability of sites for allocation. National Policy relating to Green Belt has been taken into account and exceptional circumstances are identified for Green Belt boundary changes to support identified options for delivering sustainable development. Complaints submitted about the approval process for planning applications are required to be dealt with through a separate process to the examination of a Local Plan. All representations received in response to Local Plan consultations are considered.	No
A0055	B001	Point allocation for Clive should be reassessed to reflect currently available services	Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive. With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility. With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub. Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0056	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Wem Hubs : Clive	No	No	No	Identified services no longer available in Clive namely permanent loss of bowling green and shop. Needs to be taken into account in decision making
A0057	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Shrewsbury Hubs: Longden	Not Specified	No	Not Specified	Disagree with Hierarchy of Settlements as applied to Longden. Disagree with sites which have been included despite appeals on these sites being rejected (016 & 022).
A0058	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Shrewsbury Hubs: Longden	Not Specified	No	Not Specified	Disagree with Hierarchy of Settlements as applied to Longden. Disagree with sites which have been included despite appeals on these sites being rejected (016 & 022).

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0056	B001	Take into account changes to available services/facilities & remove Clive as a Hub	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0057	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach.</p> <p>In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.</p>	No
A0058	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach.</p> <p>In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0059	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2. Community Hubs: Wem Place Plan Area	Not Specified	No	Not Specified	Outdated information used
A0060	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Legal Compliance - General	No	No	Not Specified	Council should respond to the following issues before proceeding to approve and submit the Submission Local Plan to the Secretary of State. The issues to be addressed are: (1) the inadequacies with the evidence base used to inform this review process; (2) the methodology applied when calculating Shifnal's employment need, (3) justification on how other sites in Shifnal were ruled out in the sustainability appraisal and (4) the heritage assessment used to inform their site selection process and (5) why SC has chosen to take on the overspill of employment and housing development required by the Black County.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0059	B001	Take into account loss of services/facilities & remove Clive as a Hub	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0060	B001	Council should respond to the following issues before proceeding to approve and submit the Submission Local Plan to the Secretary of State. The issues to be addressed are: (1) the inadequacies with the evidence base used to inform this review process; (2) the methodology applied when calculating Shifnal's employment need, (3) justification on how other sites in Shifnal were ruled out in the sustainability appraisal and (4) the heritage assessment used to inform their site selection process and (5) why SC has chosen to take on the overspill of employment and housing development required by the Black County.	<p>Shropshire Council considers that a proportionate and robust evidence base has been prepared to inform the draft Shropshire Local Plan. Shropshire Council also considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Comments on the Sustainability Appraisal (SA) noted. Proposed changes to SA would have no material effect so are not considered necessary.</p> <p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0060	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Legal Compliance - Gunning Principles	No	No	Not Specified	Common Law imposes specific requirements on public consultation through R.V Brent LBC Ex p. Gunning {1985} 4 WLUK 200 which set four legal principles for consultations to be legal (known as the Gunning Principles). These are that (i) Plans must be at a formative stage before a final decision has been made or pre-determined by the decision maker. the Council have not published consultation responses following the Regulation 18 Plan prior to publishing the Regulation 19 Plan and no written responses have been prepared to permit the public and elected local representatives to consider the arguments for the Regulation 19 Plan. This is considered to imply that the proposals in the Regulation 18 Plan were not at a formative stage and the Regulation 19 Plan has already been pre-determined including the employment land allocations in Shifnal. The Council have not responded to inconsistencies in the recording of the hectareage of land for SHF018b and SHF018d suggesting the figures used to release Green Belt land are not based on sound evidence contrary to the Gunning principles. Council also advertised RAF Cosford and SHF018b/SHF018d as potential development sites outside of the Green Belt prior to the strategic sites consultation where the sites were proposed for release from the Green Belt suggesting the Council had predetermined their strategic sites which is re-enforced by the lack of response to objections and queries following the consultation. (ii) There is sufficient information to give 'intelligent consideration' to the information provided. A number of evidence documents are missing, incomplete or out of date including the Local Transport Plan, Annual Monitoring Report, Tree & Woodland Strategy, Health and Well Being Strategy expires in 2021, no formal Estate Plans have been published to support Policy SP15, the Tourism Economic Impact Report is 2013, Landscape Characterisation Assessment is 2006. Information on the website, such as the proposed Local Plan period and the Local Development Scheme have not been kept up-to-date. There has been a lack of clarity over the hectareage of the employment allocations and the densities for the housing allocations in Shifnal, double counting in the calculation of the land area to be made available on the employment allocations which impacts on the release of Green Belt land. Inaccuracies in the Sustainability Appraisals. Therefore, how can the public be expected to judge the soundness of policies and proposals in the Plan, when crucial parts of the evidence are unavailable for the public to view. This is especially important when these proposals are likely to impact on the need to release Green Belt land. As well as going to the soundness of the plan and compliance with Government guidance, the failure to make accessible to the public evidence relied on by the Council, is contrary to the legal requirement in the Gunning case to permit intelligent consideration of accurate information bringing the soundness of the plan into question. (iii) There is adequate time for consideration and response to provide sufficient opportunity for consultees to participate in the process. There has been insufficient time through the review process with Regulation 18 Pre-Submission consultation permitting only 8 weeks during the summer holiday period. The Regulation 19 consultation was conducted in a similar manner over the Christmas period and national lockdown (addressed through an extension of the period) with libraries closed preventing access to the consultation documents that included matters affecting the whole County, 35 new policies referring to 50 evidence documents with appendices and a large number of new evidence documents contributing to the 11,000 page evidence base. In contrast, the Preferred Scale & Distribution of Development and Issues & Options Consultations that avoided holiday periods or the Preferred Sites and Strategic Sites consultation for just 4 sites that covered longer periods of 9 and 10 weeks. The period allowed was also reduced by the fact that several pieces of evidence quoted in the Plan were not put on the evidence base website at the start of the consultation period and nearly half was not put on the evidence base at all (this included the Infrastructure and Implementation Plan, Economic Development Needs Assessment, Transport Plan and Estate Plans) contrary to the statement on the Councils website on this consultation. This also contrasts with consultations on other public documents including a 12 week consultation on the revised Statement of Community Involvement that is 27 pages; 8 weeks for the Community and Rural Strategy that is 22 pages; and 12 weeks for the Cultural Strategy that is 33 pages. It is considered that this inconsistency is further evidence that this consultation is flawed and legally questionable. (iv) 'Conscientious consideration' must be given to the consultation responses before a decision is made. It is considered that the Council have not published evidence showing how consultation responses have been taken into account. The publication of a summary of responses does not demonstrate how feedback has been considered and how it has been incorporated into the next review phase or why the Council took decisions contrary to recommendations in the consultation responses.
A0060	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Duty to Co-operate	No	No	Not Specified	The duty to cooperate is a legal requirement for council's and statutory bodies to work together on strategic cross-boundary issues. In SC's case the county is adjoined by several local authority areas, and there are areas beyond this with a functional relationship, most notably the Black Country. As previously set out, there is no information contained in SC's evidence base which demonstrates why SC are proposing to include 1,500 dwellings to meet the Black Country needs. Without this key information being made publicly available, we cannot ascertain whether or not the duty to cooperate, under the Localism Act and NPPF has been conducted in an appropriate manner.
A0060	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Statement of Community Involvement	No	No	Not Specified	The Statement of Community Involvement (SCI) has not been regularly reviewed as required by Government guidance. The Council has also failed to comply with their SCI. The Town Council and local community have previously submitted detailed comments on locally relevant issues at each consultation stage, but SC have failed to respond to those concerns showing how they have taken those views into account or why they have not accepted them. This does not constitute effective or meaningful dialogue as the community involvement has been one way.
A0060	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Statement of Common Ground	No	No	Not Specified	Paragraph 27 of the NPPF sets out that 'authorities should produce, maintain, and update one or more statement(s) of common ground, throughout the plan-making process'. It goes onto state that 'such statements should be made publicly available throughout the plan-making process to provide transparency'. One of the tests of soundness is that a Plan must be effective and that cross-boundary matters that have been addressed are to be evidenced by the statement of common ground. This has not been demonstrated by SC and the current review process is unsound. As set out above SC are proposing to include 1,500 dwellings to meet the Black Country needs and no statement of common ground was submitted to accompany this consultation. Without this statement, there was no information on identified needs as required by paragraph 012 (reference ID: 61_024012-20190315) of the Plan Making guidance, for the public to understand the reasoning for this change. The NPPF requires that such statements should be provided throughout the preparation of the plan and not at the end. As members of the public have not been consulted on this, the evidence base is clearly flawed.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0060	B002	See summary of main issues.	<p>Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p>	No
A0060	B003	See summary of main issues.	<p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No
A0060	B004	N/A	<p>Shropshire Council strongly considers that it has met the requirements of the Statement of Community Involvement. The consultation process undertaken is also considered to comply with the Gunning Principles and national legislation.</p>	No
A0060	B005	N/A	<p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0060	B006	Sustainability Appraisal	Sustainability Appraisal	No	No	Not Specified	Shropshire Council failed to satisfy Section 19 of the Planning and Compulsory Purchase Act 2004(PCPA), Regulation 5(1) and Regulation 12 and Schedule 3 of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) and the European Directive 2001/42/EC in Recital 17 to use the environmental report to inform the Plan and generally in “the assessment of the effects of certain plans and programmes on the environment”. The Council also failed in relation to the Strategic Environmental Assessment and Sustainability Appraisal guidance note Paragraphs 002 to undertake an iterative process and Para 018 to consider all reasonable alternative sites and the reasons for setting them aside. The preparation of the Pre-Submission Plan is therefore legally flawed and unsound. This failure is endorsed by Seaport Investments Ltd 2002 NIQB 62 that there must be parallel development of the environmental report and draft plan. In Berkeley v SoS Others 2002 3 WLR & Save Historic Newmarket Ltd v Forest Heath DC (2011 EWHC 606, and Royal Brompton & Harefield NHS Foundation Trust v Joint Committee of Primary Care Trusts (2011) EWHC 2986, there must be an environmental statement in a single accessible format prepared from the start of the process and presenting relevant environmental information with a non-technical summary to assist potential consultees. The Sustainability Appraisal fails to properly assess sites against all scoping objectives especially proximity to public transport (SO6 incorrectly recorded as quality of agricultural land), reduction of CO2 emissions (SO12) and adaptation and mitigation to climate change (SO13). The SA used to inform the site assessments failed to assess these key Scoping Objectives in the Pre-Submission Plan and Strategic Sites consultation rendering the process not legally compliant and producing site selection decisions that are inadequate, incorrect and unintelligible under the Gunning Principles. Site SHF018d was also not included in the SA and not assessed individually or against reasonable alternatives including SHF018a with a lower sustainability scoring. This indicates a pre-determination of the selected sites contrary to the Gunning Principles requiring consultation at a formative stage before final decisions are made. The SA on the Preferred Scale and Distribution (PSD) consultation stage was prepared on the basis Shifnal would receive 16ha of employment land and would minimise the need for additional car based transport. The Preferred Sites (PS) stage increased the amount of employment land for Shifnal to 40ha, but the SA failed to assess public transport criteria and to assess the SHF018d individually or against alternatives. The Council cannot show the increase in employment from 16 to 40ha and the allocation of Shif18d for employment use, would be sustainable development as these matters were not appraised at the appropriate time. The SLAA Report 2018 did not present a map with sites boundaries and these boundaries could only be ascertained through a web-site search without any cross referencing in the SLAA report. There was no map in the SA for the public to identify the location and boundaries of sites appraised. Case law states that a disparate collection of documents traceable only by a person with a good deal of energy and persistence does not satisfy legal requirements on making documents available to the public.
A0060	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 - Housing	No	No	Not Specified	Policy SP2 requires, from 2016 to 2038, provision of around 30,800 new dwellings at around 1,400 dwellings per annum. SC need to clarify and justify the uplift and sustainability of this housing target to 30,800 above the minimum 25,894 new dwellings required by central Government and above the demographic need of only 20,746 new dwellings and why 1,500 dwellings for Black Country needs is also accommodated in the proposed housing provision (this is despite their being no change to the standard methodology for most West Midlands local planning authorities except for Birmingham, Wolverhampton, Coventry and Stoke-on-Trent. Further the National Planning Policy Framework (NPPF) states any unmet need from neighbouring areas should only be accommodated where it is practical to do so and is consistent with achieving sustainable development, failing to detail why and how this will be accommodated in contrary to the NPPF and unsound - the Green Belt exceptional circumstances paper states Shifnal will play a role in meeting this need, requiring release of Green Belt without considering alternative locations and resulting in unsustainable development (due to existing infrastructure deficiencies and community desire to retain village feel) so is unsound and should have been assessed through Sustainability Appraisal (SA) so is contrary to legal requirements regarding SA). The existing 'standard methodology for calculating housing requirements is based on the lower 2014-household projections (not the 2018 based projections) for both Shropshire and Telford & Wrekin which would permit SC to reduce their housing targets rather than increase them to 30,800 dwellings. Proposals are contrary to SC strategic objectives of requiring sustainable development (with necessary supporting infrastructure) and communities. No evidence provided that more housing will result in more affordable housing or employment to meet housing growth. Consider a more moderate requirement would be more appropriate, particularly given Covid and risk to the Five Year Housing Land Supply (and potential associated unplanned development). If the Black Country are able to demonstrate unmet need, this should be accommodated in Telford, as the largest settlement in east Shropshire and given its reason for being constructed.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0060	B006	See summary of main issues.	The Council considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.	No
A0060	B007	The existing 'standard methodology for calculating housing requirements is based on the lower 2014-household projections (not the 2018 based projections) for both Shropshire and Telford & Wrekin which would permit SC to reduce their housing requirement from 30,800 dwellings.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0060	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 - Employment	No	No	Not Specified	<p>Policy SP2 requires, from 2016 to 2038, around 300 hectares of employment land at around 14ha of employment land per annum. Appendix 6 of the Employment Land Supply states that the strategic employment land supply will be 414ha and it is unclear how this figure contributes to the employment land requirement nor why the two figures are different, a consistent figure is required for soundness. Distribution of employment to settlements and justification for Green Belt release cannot be justifiably undertaken with such divergence. Also unclear/unjustified how the 300ha can accommodate 30ha contribution to the Black Country, yet the employment land requirement is the same as that previously proposed to balance housing growth (the equivalent housing requirement increased).</p> <p>The 300ha requirement is considered sufficient to deliver enough jobs to achieve a sustainable balance with their housing requirement but SC need to explain how this balanced growth projection was calculated. The proposed 30,800 dwellings and 300 ha of employment land seem disproportionate and as an example, guideline employment land figure for Shifnal was previously 16 ha but increased to 41ha in the Pre-Submission Draft SLP. SC indicate the 1,500 new dwellings proposed at Shifnal should equal circa 1,500 new jobs. Each job needs on average 42.25 sq.m of finished floorspace equal to 40% of the entire employment site. This means, an additional 40% needs to be added to the overall total. The calculation is 1,500 new dwellings x 42.25 sq.m of floorspace x 40% equal to 15.84 ha. For the figure to increase to 41ha, the 40% provided by SC appears to be already included in the balanced growth calculation of 16 ha. SC need to explain the methodology to calculate Shifnal's employment need. The employment land supply figure identified by SC also fail to account for employment land proposed at RAF Cosford (Aviation Academy, 1500 additional military personnel; new air ambulance development). This additional land puts the actual employment land figure at +50% above the 300ha requirement and so, there is a clear over provision of employment land over the next plan period.</p> <p>The Economic Growth Strategy which underpins the draft Shropshire Local Plan will be out of date before adopted of the Plan and fails to consider the long term economic situation to 2038. Reliance on it is unjustified and unsound. The impact of Covid 19 is also ignored which is unsound, this is likely to affect economic aspirations and would support a more cautious approach - delivery of employment may not keep up with housing and could come under pressure for housing.</p>
A0060	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	No	No	Not Specified	<p>Paragraph 7 of the NPPF sets out that 'the purpose of the planning system is to contribute to the achievement of sustainable development'. The draft plan has not been proactively prepared in accordance with the three overarching objectives, which help form sustainable development. Significant weight is placed on the economic objective for Shifnal and the wider district but very little on the social and environmental objectives. The proposed inclusion of 41 ha of employment land and 1,500 new dwellings in Shifnal will lead to substantial losses of Safeguarded Land and Green Belt eroding the natural green space between Shifnal and Tong. Contrary to paragraph 9 of the NPPF, the local circumstances, needs and opportunities for Shifnal are not considered and the proposed urban extension will have a detrimental effect on the surrounding landscape, road infrastructure, schools and health services. The proposed Draft Plan is therefore unsound. There is no recognition in the Pre-Submission Draft SLP of the potential impacts of Covid-19 on the local economy, including increased homeworking reducing the need for employment land. A more conservative estimate of the employment land requirements should be undertaken, with reconsideration of the requirement waiting until the next plan review, reassessing the economic situation when the full effects of Covid-19 can be assessed. Otherwise, there is a high likelihood that employment will not keep up with the high housing figure proposed and so balanced growth will not occur nor will sustainable development be achieved in accordance with Policy SP4.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0060	B008	The actual employment land available in the County +50% higher than the 300ha requirement and so, the employment land requirement may be reduced over the next plan period. The employment land guideline for Shifnal should also be reduced to 16ha.	<p>In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038.</p> <p>Shropshire Council also consider that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0060	B009	A more conservative estimate of the employment land requirements should be undertaken, with reconsideration of the requirement waiting until the next plan review, reassessing the economic situation when the full effects of Covid-19 can be assessed.	<p>The draft Shropshire Local Plan seeks to achieve the sustainable development of Shropshire. All references to sustainable development within the draft Shropshire Local Plan recognise the three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). This is recognised within the introduction to the draft Shropshire Local Plan, which states "the pursuit of sustainable development is at the heart of the planning process" and that "achieving sustainable development will mean that decision takers must look at all facets of sustainability in arriving at decisions: economic, social and environmental. In all cases a balance of considerations is needed, and it is accepted this will often lead to a variety of opinions being expressed."</p> <p>The proposals within the draft Shropshire Local Plan have been informed by a comprehensive Sustainability Appraisal process.</p> <p>Draft Policy SP4 is not seeking to define sustainable development, rather it is providing clarity on how the presumption in favour of sustainable development introduced within the NPPF would apply, if relevant, in Shropshire.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Comments on the Sustainability Appraisal (SA) noted. Proposed changes to SA would have no material effect so are not considered necessary.</p> <p>With regard to the proposed safeguarded land, it is noted that the National Planning Policy Framework (NPPF) states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development".</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0060	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	No	No	Not Specified	Policy SP6 sets out that new development should ensure the health and well-being of individuals, communities and places. The location of Shifnal's employment land to the north east and future strategic housing to the south and west is contrary to the Neighbourhood Plan and the views of the local community on the future development of their town. A large proportion of Shifnal's existing and new housing stock south and west is split from the proposed employment land to the north east. The existing central railway line makes access from the south and west to the new employment land only achievable through the centre of Shifnal via the Market Place, Victoria Road, Braford Street and Aston Street junctions on a road network too constrained to carry the proposed increased transport movements throughout the town. This is assessed in 'Comments on the Effect on Traffic in Shifnal Caused by the Proposed Employment Land Development (Land off Stanton Road). In addition, the infrastructure improvements including highways improvements required by the recent inclusion of 1,100 new dwellings have yet to be implemented in Shifnal and Shifnal does not have the infrastructure or facilities to accommodate 41 ha of employment land and a further 1,500 new dwellings, in addition to the 1,100 new dwellings being built out. The employment and housing allocations are disproportionate to the existing settlement, fail to maintain or enhance the vitality of Shifnal and have a harmful impact on the social wellbeing of the local community, risking the erosion of community cohesion. SC must assess the proposed cumulative growth in Shifnal over this relatively short time from 2012 – 2021 and through the 2038 which will have a negative impact on social wellbeing and social cohesion within Shifnal contrary to Policy SP6.
A0060	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	No	No	Not Specified	SC concluded that exceptional circumstances exist for the release of Green Belt land without properly satisfying NPPF paragraph 137 to demonstrate that all other reasonable development options for meeting identified needs have been properly assessed. This omission affects land released for housing and employment uses on sites allocated for development to 2038 and also land safeguarded for future development. The evidence base for the Local Plan did not provide the reasons why other sites were rejected and did not consider other opportunities for industrial development within neighbouring Telford and the sub-region (Staffordshire, Wolverhampton, West Midlands etc) before changing the Green Belt boundaries around Shifnal. Shifnal Town Council suggested SHF018a as a more sustainable option than SHF018b/SHF018d to meet the employment needs of the town and no explanation was provided for rejecting SHF018a as safeguarded land. The land that is safeguarded is not justified in the evidence base, Sustainability Appraisal or Proposals Map. There is also conflict in Policy S15.1 between Point 4 which seeks to promote the local and sub-regional role and functions of Shifnal and Point 7 which protects the safeguarded land from development except in very special circumstances. These very special circumstances relate more to the sub-regional role of the town than to the local objectives in the Neighbourhood Plan which is a material consideration for the Local Plan. This also reflects an objective in the exceptional circumstances statement that Shifnal should perform the same role as Bridgnorth even though Shifnal is a smaller settlement, located close to the strategic centre of Telford. Shifnal is also expected to be influenced by development of the strategic site on the former Ironbridge Power Station. The release of Green Belt land for development and safeguarding cannot be justified as all reasonable options for development have not been assessed and exceptional circumstances for the release of this Green Belt land have not been properly identified.
A0060	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	No	No	Not Specified	Policy SP12 refers to the employment requirement to deliver around 300 ha of employment land throughout the plan period. The spatial strategy identified to achieve these objectives is also set out in Policy SP12. There is no explanation in this Policy nor in the description of the strategy to explain the reasons why proposed employment allocation SHF018d and SHF018b have been brought forward in Shifnal over other sites and SHF018a, in particular. This omission makes it difficult to establish whether the plan led approach is successful in protecting and improving areas of higher landscape value. In the evidence presented as part of SC's Highways Assessment, it is unclear why site 2- plots SHF018b & d are identified as having low or medium highways impact, whilst adjoining sites 1 and 3 are considered as having a high to very high highways impact. SC also need to clarify the methodology used for calculating Shifnal's balanced growth and resulting employment need. Policies SP12, SP13 and SP14 allow for unplanned development (employment development supported by new housing and infrastructure) outside settlements particularly adjacent to settlements in a strategic corridor and strategic sites (including RAF Cosford) and in the Green Belt, despite presence of proposed allocations. Plan proposals are subject to Sustainability Appraisal, sites under this proposed policy approach would not. Public entitled to some certainty about development. Consider these is no need for this flexibility as this would undermine/conflict with policies for specific settlements and the Green Belt and are also contrary to the legal requirement in Section 39 of the Planning & Compulsory Purchase Act 2004 that a Plan must be prepared with the objective of contributing to the achievement of sustainable development. Where a need is identified that cannot be accommodated within the plan this can be considered on its own merits.
A0060	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	No	No	Not Specified	Policies SP12, SP13 and SP14 allow for unplanned development (employment development supported by new housing and infrastructure) outside settlements particularly adjacent to settlements in a strategic corridor and strategic sites (including RAF Cosford) and in the Green Belt, despite presence of proposed allocations. Plan proposals are subject to Sustainability Appraisal, sites under this proposed policy approach would not. Public entitled to some certainty about development. Consider these is no need for this flexibility as this would undermine/conflict with policies for specific settlements and the Green Belt and are also contrary to the legal requirement in Section 39 of the Planning & Compulsory Purchase Act 2004 that a Plan must be prepared with the objective of contributing to the achievement of sustainable development. Where a need is identified that cannot be accommodated within the plan this can be considered on its own merits.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0060	B010	Council must assess the proposed cumulative growth in Shifnal over this relatively short time from 2012 – 2021 and through the 2038 which will have a negative impact on social wellbeing and social cohesion within Shifnal contrary to Policy SP6.	The Council considers that there is no conflict between Policy SP6 and its strategy for Shifnal. The latter forms part of the overall approach to development in Shropshire which is aimed at achieving all facets of sustainable development, social, economic and environmental.	No
A0060	B011	See summary of main issues.	<p>It is understood that this representation primarily relates to the proposed strategy for Shifnal and not the content of draft Policy SP11. Issues raised relating to Shifnal are addressed in the relevant settlement section.</p> <p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0060	B012	Draft Policies SP12, SP13 and SP14 should be replaced with a general economic development policy stating any windfall/significant development that cannot be accommodated within a settlement, would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land.	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. It is considered that an employment land provision at Junction 3 of the M54 Motorway is not required during this Plan period to 2038. The employment policies SP12, SP13 and SP14 would still be sufficiently flexible to accommodate such an outcome in the event that the circumstances determining the strategy for the Local Plan were to change considerably during the Plan period.	No
A0060	B013	Draft Policies SP12, SP13 and SP14 should be replaced with a general economic development policy stating any windfall/significant development that cannot be accommodated within a settlement, would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land.	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0060	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	No	No	Not Specified	Policy SP14 reiterates that development in the 'strategic corridors through the Green Belt or Shropshire Hills Area of Outstanding Natural Beauty will be subject to appropriate national and local policy. We consider that the proposed 41ha of employment land at Shifnal is at conflict with paragraph 137 of the NPPF, because exceptional circumstances to justify the Green Belt release in the area, has not been provided throughout the review process. The Pre-Submission Draft SLP refers to the role that Shifnal would play to provide strategic economic development in the M54 strategic corridor. The employment land proposed at RAF Cosford has not been included in the overall calculations to assess the need and it should be acknowledged that there is a plentiful supply of already committed employment land in neighbouring authorities in this corridor. It is an unsustainable assumption that Shifnal would attract such strategic employment development to justify the release of such large areas of Green Belt. Policies SP12, SP13 and SP14 allow for unplanned development (employment development supported by new housing and infrastructure) outside settlements particularly adjacent to settlements in a strategic corridor and strategic sites (including RAF Cosford) and in the Green Belt, despite presence of proposed allocations. Plan proposals are subject to Sustainability Appraisal, sites under this proposed policy approach would not. Public entitled to some certainty about development. Consider these is no need for this flexibility as this would undermine/conflict with policies for specific settlements and the Green Belt and are also contrary to the legal requirement in Section 39 of the Planning & Compulsory Purchase Act 2004 that a Plan must be prepared with the objective of contributing to the achievement of sustainable development. Where a need is identified that cannot be accommodated within the plan this can be considered on its own merits.
A0060	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	No	No	Not Specified	There is no justification for Policy SP15 to support the non-statutory plans of larger estate owners. The implementation of Policy SP15 would support the long-term vision and objectives of Bradford Estates to promote a new settlement at Tong providing support in principle for a development not currently proposed in the Local Plan housing requirement or housing supply projection (support decision not to include this site). This would prejudice the ability of the public to comment on the specific development proposal and to influence the degree of future flexibility in permitting further development. This is despite the intention to have "meaningful public consultation" which could be open to wide interpretation depending on the point of view of the promoters or planning authority etc. Accordingly, there is a concern that Policy SP15 allows Bradford Estates to promote this scheme without any justification for the special privileges given to larger landowners in the County. SP15 prejudices the community against larger landowners which can be argued as being contrary to the Equality Act. There is little explanation for this policy and consider Estate proposals could be considered under wider draft Policies. No estate plans are provided as part of the Key evidence for the draft Shropshire Local Plan, contrary to Gunning principles.
A0060	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17	No	No	Not Specified	The strategic housing and employment allocations in Shifnal do not conform with Policy DP17 because they are not properly assessed against other sites in the Sustainability Appraisal nor are reasons given for rejecting alternative sites contrary to Section 13 of the NPPF (Protecting Green Belt Land). The Sustainability Appraisal (pages 91 – 96) finds Sites SHF018b and P15b score poorly for overall sustainability and much of the proposed 'safeguarded land also gets lowish scores but are included in the proposed sites. The extension east of Upton Lane (SHF018d) is contrary to national policy, as no exceptional circumstances are provided for its release. SC do not correctly apply the findings of the Green Belt Review Assessment to SHF018d which constitutes an unacceptable encroachment into the countryside, with no recognisable, permanent boundary, causing High Harm to the Green Belt and extending east of Upton Lane which is a clearly defined Green Belt boundary. This indicates no exceptional circumstances for this land release given the availability of alternative sites causing Less Harm particularly SHF018a now proposed as safeguarded land. SC state the Green Belt land releases for employment use (SHF018b and SHF018d) are of Moderate to High Harm but land east of Upton Lane has a High Harm to the Green Belt and landscape. SHF018d is part of Broad Area 29 In the Green Belt Review containing the proposed MAAC site intended to be removed from the Green Belt further causing moderate to high harm with no justification for these Green Belt land releases.
A0060	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP21	No	No	Not Specified	Policy DP21 sets out that, "the safeguarding of people and property and mitigation of the effects of climate change, will be achieved by directing development to areas at least risk of flooding". SC's Strategic Flood Risk Assessment sets out that the majority of Shifnal is located within Flood Zone 1, with the area immediately around the Wesley Brook located within Flood Zones 2 and 3 (1 being low risk and 3 being high). This report has also identified that Shifnal has one of the highest surface water flood risks in the county and would be the most vulnerable to cumulative increases in flood risk due to new development. With most of this risk coming from Wesley Brook being a source to its confluence with River Worfe. In accordance with paragraph 157 of the NPPF it should be noted that the Sequential and Exception Test of Shifnal's proposed allocated sites in the Pre-Submission Draft Local Plan does not fully recognise Shifnal's identified surface water flood issues.
A0060	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23	No	No	Not Specified	To date no strategic plan has been presented to illustrate how the Development Strategy for Shifnal will ensure the historic character of the town will be preserved or enhanced after the towns proposed extension in accordance with the objectives of Policy SP23. Evidence for the strategic allocations advised that heritage assessments were produced to inform the site selection process but it remains unclear as to how the historic environment was considered in the evidence base or from the Sustainability Appraisal contrary to Paragraph 185 of the NPPF which would question the soundness of the Plan. The Landscape and Visual Sensitivity Assessment also confirms the majority of parcels have visual and landscape sensitivity issues for existing landscapes, listed buildings and conservation areas. The allocations will change the appearance of the historic character of Shifnal, there will be intensification of traffic flows through the centre of Shifnal which is a factor that Historic England regards as affecting historic towns with development of transport infrastructure also affecting historic landscapes and damaging heritage assets.
A0060	B019	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP25	No	No	Not Specified	Shifnal has limited investment in infrastructure (including roads and footpaths, new medical centre, education and leisure facilities) to support the expansion of the town despite the recent 1,100 new dwellings recently approved and currently being built out, resulting in some 40% increase in the town's population. The Pre-Submission Draft SLP paragraph 5.215 highlights that the future housing extension to south and west of the town which is safeguarded) will provide improvements at Five Ways and Innage Road. However, S106 funding has already been obtained from developers of recent large housing developments for improvements to Fiveways to meet the increased traffic needs of the town. Further to this, no practical infrastructure improvements have been identified to accommodate the proposed growth of the town.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0060	B014	Draft Policies SP12, SP13 and SP14 should be replaced with a general economic development policy stating any windfall/significant development that cannot be accommodated within a settlement, would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land.	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic.	No
A0060	B015	There is a strong objection to policy SP15 and its potential interpretation which may prejudice the future protection of the Green Belt and public participation on future development proposals and the Council must address the omission of the Estate Plans in the Local Plan evidence base by making them available on the public.	Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal. Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.	No
A0060	B016	See summary of main issues.	Policy DP17 requires development proposals to assess their impact on landscape and visual amenity and will apply to any planning applications on sites SHF018b, P15b and SHF018d. The principles behind policy DP17 have been applied through the Sustainability Appraisal and Site Assessment process which considered the landscape and visual sensitivity of all SHLAA sites based on the Council's Landscape and Visual Sensitivity Study.	No
A0060	B017	See summary of main issues.	The application of the Sequential and Exception Tests to all proposed site allocations is based on the information contained in the Council's Strategic Flood Risk Assessments (Levels 1 and 2) and follows national planning policy and guidance. As such the Council feels it is accurate and appropriate.	No
A0060	B018	The heritage assessments informing these decisions should be published to show the mitigation for the future conservation and preservation of heritage assets in Shifnal town centre.	Policy DP23 will ensure that heritage assets in Shifnal are safeguarded in response to development proposals. The Sustainability Appraisal and Site Assessment process considered heritage assets throughout and the results are available on the Council's website. No change proposed.	No
A0060	B019	The Council need to acknowledge the infrastructure needs of the community and their concerns at the infrastructure capacity of the town and where and when further infrastructure investment will be provided in advance of further developments in Shifnal.	The infrastructure needs of Shifnal will be taken into account through the Strategic Infrastructure Implementation Plan and Place Plan process.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0060	B020	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Shifnal Town Strategy	No	No	Not Specified	<p>Consider proposed allocations SHF018b/SHF018d are contrary to NPPF Green Belt policy, the law, Gunning Principles and policy on sustainable development and sustainability appraisal and the legal requirement to consider reasonable alternatives and to give reasons why those alternatives were not selected and the need to justify exceptional circumstances (as required for Green Belt release). As such they are not considered sound.</p> <p>-It is illogical to allocate land for development whilst leaving undeveloped land between it and the town boundary (SHF018a/P14).</p> <p>-SHF018a/P14, benefit from a functional relationship with the adjacent Industrial Estate - lacking for SHF018b/SHF018d yet referenced in draft site guidelines.</p> <p>-SHF018a/P14 would lead to less harm to the Green Belt than SHF018b/SHF018d (SHF018b/SHF018d would represent encroachment into the countryside and beyond Lamledge Lane. SHF018d also lacks defined boundaries, as recognised within the Green Belt Review, contrary to para 139(f) of the NPPF. Para 5.211 of the draft Shropshire Local Plan incorrectly references the harm of proposed employment allocations and medium-high when it will be high).</p> <p>-Site SHF018d has not been subject to a Sustainability Approval as required by law and policy despite having a high degree of harm to the Green Belt as shown in the evidence base.</p> <p>-Safeguarded sites SHF018a/P14 are more sustainable sites in the SLAA assessment than the allocated employment sites SHF018b/SHF018d.</p> <p>-Sites SHF018a/P14 have a lower negative sustainability score in the Sustainability Appraisal.</p> <p>-Sites SHF018a/P14 have a similar site areas to SHF018b and would meet the original requirement for 14ha of additional employment land (without the unjustified further 24ha).</p> <p>-Past consultation documents stated the Council recognised the important contribution the promoters of SHF018b/SHF018d will make to the future of Shifnal through expeditious delivery, yet no evidence of this is provided. This also suggests pre-determination of the allocation. As does the inclusion of the site in the Invest In Shropshire Brochure.</p> <p>No evidence has been submitted to justify why sites SHF018a/P14 were not considered appropriate for allocation as the preferred employment sites, even though they were 'reasonable alternative' sites. SHF018b could then be safeguarded (if needed) and SHF018d remain in the Green Belt.</p> <p>Draft site guidelines for SHF018b/SHF018d include significant improvements to Stantion Road and no traffic to go west into Shifnal. However, no evidence of improvements, costs or how they will be undertaken (including restrictions to traffic to the west). As such proposals are unsound (must be effective and deliverable).</p> <p>It appears the increase to the employment land guideline proposed for Shifnal is simply to accommodate SHF016b/SHF018d, rather than to meet the needs of the town.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0060	B020	Delete proposed allocations SHF018b/SHF018d. If the employment land guideline justifies it, allocate sites SHF018a/P14 and safeguard SHF018b.	<p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings including sites SHF015 &amp; SHF029 that will make an important contribution to meeting the housing needs of Shifnal and helping to conserve the important historical building of Beech House and its curtilage structures and land. These allocation complement the existing committed supply of 370 dwellings which further complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021 and which will deliver the 1,500 housing guideline figure for Shifnal. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. . Development guidelines for sites released for development will ensure the site design, layout and landscaping respects the character and significance of adjoining land uses. In the Green Belt, this is required to strengthen the boundary to the urban area to help maintain the openness and permanence of the Green Belt around Shifnal.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0060	B021	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Shifnal: SHF018b/SHF018d	No	No	Not Specified	<p>Consider proposed allocations SHF018b/SHF018d are contrary to NPPF Green Belt policy, the law, Gunning Principles and policy on sustainable development and sustainability appraisal and the legal requirement to consider reasonable alternatives and to give reasons why those alternatives were not selected and the need to justify exceptional circumstances (as required for Green Belt release). As such they are not considered sound.</p> <p>-It is illogical to allocate land for development whilst leaving undeveloped land between it and the town boundary (SHF018a/P14).</p> <p>-SHF018a/P14, benefit from a functional relationship with the adjacent Industrial Estate - lacking for SHF018b/SHF018d yet referenced in draft site guidelines.</p> <p>-SHF018a/P14 would lead to less harm to the Green Belt than SHR018b/SHF018d (SHF18b/SHF018d would represent encroachment into the countryside and beyond Lamledge Lane. SHF018d also lacks defined boundaries, as recognised within the Green Belt Review, contrary to para 139(f) of the NPPF. Para 5.211 of the draft Shropshire Local Plan incorrectly references the harm of proposed employment allocations and medium-high when it will be high).</p> <p>-Site SHF018d has not been subject to a Sustainability Approval as required by law and policy despite having a high degree of harm to the Green Belt as shown in the evidence base. -Safeguarded sites SHF018a/P14 are more sustainable sites in the SLAA assessment than the allocated employment sites SHF018b/SHF018d. -Sites SHF018a/P14 have a lower negative sustainability score in the Sustainability Appraisal. -Sites SHF018a/P14 have a similar site areas to SHF018b and would meet the original requirement for 14ha of additional employment land (without the unjustified further 24ha). - Past consultation documents stated the Council recognised the important contribution the promoters of SHF018b/SHF018d will make to the future of Shifnal through expeditious delivery, yet no evidence of this is provided. This also suggests pre-determination of the allocation. As does the inclusion of the site in the Invest In Shropshire Brochure.</p> <p>No evidence has been submitted to justify why sites SHF018a/P14 were not considered appropriate for allocation as the preferred employment sites, even though they were 'reasonable alternative' sites. SHF018b could then be safeguarded (if needed) and SHF018d remain in the Green Belt.</p> <p>Draft site guidelines for SHF018b/SHF018d include significant improvements to Stanton Road and no traffic to go west into Shifnal. However, no evidence of improvements, costs or how they will be undertaken (including restrictions to traffic to the west). As such proposals are unsound (must be effective and deliverable).</p> <p>It appears the increase to the employment land guideline proposed for Shifnal is simply to accommodate SHF016b/SHF018d, rather than to meet the needs of the town.</p> <p>The proposed employment development land located off Stanton Road will create a substantial increase in traffic on Stanton Road and Aston Street even if commercial vehicles could be effectively restricted from using this route. The main commercial centre in East Shropshire is Telford, which lies to the west of Shifnal, and Aston Street is the direct route to Telford from the proposed development. Vehicles wishing to access and egress from the west will use the Aston Street / Stanton Road route as it is more than 8 kilometres shorter than the A41 / M54 route to Junction 4 of the M54. The A41/Stanton Road junction is also a site of morning and evening stationary traffic for vehicles trying to travel in the direction of the M54 Stanton Road and Aston Street are not suitable for carrying the additional volume and increased unit weight of the generated traffic because: (1) The junction with Bradford Street and the A464 trunk road is already well beyond capacity and causes substantial delays and congestion at peak periods. Proximity of buildings within the Shifnal conservation area preclude any opportunity of additional land take for upgrading. (2) The turning movements at this junction currently disrupt traffic flows on both the A464 and the A4169. (3) The existing carriageway is narrow (6 metres) and cannot be widened due to the proximity of buildings. (4) The existing carriageway construction is not engineered and is not capable of taking additional and heavier traffic. It is currently in a poor state of repair. (5) The station approach and the main shopping car park access onto Aston Street, both junctions having severely impaired sight. (6) Aston Street residents are obliged to park on Aston Street causing single line traffic flows as there is no access to the rear of their properties. (7) Aston Street dwelling doorways access directly onto the pavement, and the increase in noise, dust and vibration will be detrimental to their environment. (8) The Bradford Street/ Aston Street junction is crossed by the principal walking route to the train station from the town centre including provision for those with impaired sight and wheelchair users. (9) The existing pedestrian footpaths at the junction are narrow and hazardous.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0060	B021	Delete proposed allocations SHF018b/SHF018d. If the employment land guideline justifies it, allocate sites SHF018a/P14 and safeguard SHF018b.	<p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. Whilst Shropshire Council has proposed to support the Black Country Authorities to meet their unmet needs in Shropshire, it is not proposed to identify specific sites to accommodate the intended contribution to cross-boundary needs arising within the Black Country (1,500 dwellings and 30ha of employment land). Rather this is included within the proposed housing and employment land requirements subject to the proposed strategic approach for the level and distribution of development across Shropshire.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0060	B022	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Shifnal: Safeguarded Land	No	No	Not Specified	<p>Safeguarded land proposals are contrary to the Gunning Principles, case law, national Green Belt policy (demonstrating consideration of reasonable alternatives and exceptional circumstances) and are unsound: -There are no parcel references for proposed safeguarded land, this means it is not possible for the public to relate parcels to accompanying documents and the Sustainability Appraisal (SA), this is legally flawed. -There are disparities in the size of parcels proposed to be released from the Green Belt. -The amount of safeguarded land is considered excessive and unjustified - it exceeds previous proposals and that needed for choice and flexibility to meet long term needs. As such there are no required exceptional circumstances and proposals are contrary to national policy and unsound. -There are better sites available for safeguarding (and SHF018/P14 are better for allocation than proposed allocations). SHF015/029 is not required to meet the stated housing guideline so could be safeguarded as could land north of Upton Lane (below the skyline). These would not impact on the narrow and critical gap to Telford, have a lower harm to the Green Belt and would be more logical and sustainable (including access to schools and employment). -Objections raised in previous consultations have not been responded to, including those about deliverability meaning proposals are not effective or consistent with national policy. -Extent of sites to south-west is claimed to be required to meet highway issues, suggesting pre-determination through discussions with site promoters prior to consultation. -Decision to in effect allocate safeguarded land for specific uses is contrary to para 139d of the NPPF and unsound. This is also inconsistent, without explanation, to the approach for other settlements. -The site to the south-west (described as a new neighbourhood community) would be self-contained, splitting the community and losing the towns character and feel (contrary to the Neighbourhood Plan). Lack of clarity about what is proposed in the draft Shropshire Local Plan. -Consider the principal reason for proposals are strategic objectives (role of the town on the M54 corridor), rather than meeting the town's needs. This is contrary to the Neighbourhood Plan and an unrealistic and inappropriate objective for the town (given size and nature, presence of Green Belt, proximity to Telford etc, would just result in housing without corresponding development) and not supported by the community. -Council suggests the need for a progressive and steady rate of growth to permit necessary infrastructure improvements, however there is no guarantee of this, likely to have just housing as per recent experiences. -Significant adverse affect on the Green Belt (reduced gap to Telford, loss of open countryside and encroachment) and it is not considered exceptional circumstances have been demonstrated to justify this high harm. -Land between A464 and M54 not pursued as it would close the gap to Telford, but the same applies to the land proposed between A4169 and the railway. With regard to proposed exceptional circumstances for land south-west of the town:</p> <p>-Provision of a new strategic highway between the A464 and A4169: not been subject to public consultation, informed by detailed proposals; contrary to expressed public opinion during the Reg 18 Preferred Sites Consultation; it would not create the suggested 'by-pass' (new residents will still have to just the town centre junction for toe town centre exacerbating issues); if so important, why is the land only proposed for safeguarding and not allocation; given the costs of such a scheme, unlikely development proposals could carry it - need detailed costings and only represents an exceptional circumstances if development can fully meet them; as the route no longer links to the A464 (north) where considerable traffic originates, only likely to serve the new extension and even then only a small part of journeys south to Wolverhampton; claims it will avoid traffic going into the town are incorrect.</p> <p>-Highway improvement at Five Ways/Innage Road: S106 funds already secured from existing development for this, unclear what else is needed; Innage Road can be addressed by stopping on-street parking, recently proposed but not implemented; development of the safeguarded land would exacerbate issues on Innage Road (additional traffic).</p> <p>-Provision of a significant range/choice of housing: Cannot forecast need beyond 2039, unreasonable to use such a factor to justify Green Belt release.</p> <p>-Future opportunity to connect A4169-A464: No technical evidence an appropriate link can be formed under the railway arch (available evidence indicates commercial vehicles could not use it making a one way system unworkable) or that Network Rail would support this; relevant land is not proposed for release from the Green Belt, undermining this argument.</p> <p>-Increased access to community facilities: Majority are north of the site (employment is to the east), so access cannot be improved; scale of development would increase traffic and make access worse; recent major housing development has not seen improvements to facilities (school or GP) so no guarantee such improvements would be delivered; proximity to Telford undermine potential for retail; open space is only for residents so of no overall benefit to the community.</p> <p>-Green Infrastructure gains and management of flooding: the land is already important green infrastructure (see Green Belt Assessment), therefore development of safeguarded land would harm provision; improvements to flooding are already programmed, additional development would likely exacerbate the issue and no evidence provided of how flooding would be reduced and why this cannot be achieved without development.</p> <p>-Improved access into the town, to recreational open space and countryside in the Green Belt: No evidence provided, as above consider access will be worsened with additional traffic; also difficult to substantiate large development will improve environmental quality of the Green Belt (Green Belt Review shows land would weaken Green Belt).</p> <p>The Water Cycle Study identifies constraints to water supply and sewerage. Full consideration needed of these constraints before major housing is proposed.</p> <p>Decisions on amendments to Green Belt boundaries could be deferred to the Neighbourhood Plan, if the draft Shropshire Local Plan establishes the need for such amendments, allowing significant community input (as per Broseley).</p>
A0060	B023	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 RAF Cosford	No	No	Not Specified	<p>Policy S21 designates RAF Cosford as a strategic site to be removed from the Green Belt to complement and enable the growth aspirations in the east of the County. The potential employment and training provision on this strategic site are expected to facilitate the sustainable growth of the local economy and contribute to meeting the employment needs of nearby Albrighton. The strategic site consists of around 221ha of land, over half of which is previously developed land but the land within the site and the aspirations for future development are not included in the identified need for 300 ha of employment land over the next plan period. The Council therefore need to demonstrate the exceptional circumstances for this land release in the Green Belt contrary to paragraph 135 of the NPPF.</p> <p>Policy S21 will not prevent coalescence between settlements nor will it assist in safeguarding the countryside from encroachment or ensure the site is not used for alternative employment provision. Instead future development will have fewer restrictions (particularly in the context of wider draft Policies as referenced in representation) leading to future sprawl of different types of employment uses and requiring further Green Belt release. This has resulted in a contradiction in the Plan between RAF Cosford being removed from the Green Belt to meet the development aspirations of the military and museum and releasing the land as a Strategic Site for other major developments without the constraints of the Green Belt - Invest in Shropshire brochures made reference to the site as a potential mixed use/employment site, which is evidence of pre-determination.</p> <p>Significant development to date at RAF Cosford and Cosford Museum have already been permitted and developed under existing planning policies CS5 and MD6 without requiring uncontrolled Green Belt land releases - consider these same policies would facilitate development proposed in the draft Shropshire Local Plan and circumstances (including the Defence Review) have not changed since the adopted Local Plan was prepared to justify release of the site from the Green Belt, as such no exceptional circumstances exist to support release of the site from the Green Belt and this proposal is unsound. Any alternative uses of the site (mixed-use/employment) are also not justified, considered within the Council's Green Belt Exceptional Circumstances Statement and would also be premature given Covid 19 and the short period addressed within the Shropshire Economic Growth Strategy to release such a large area of land for new employment development.</p> <p>The lack of clarity for the proposed strategic allocation is at odds with paragraph 16 (f) of the NPPF and paragraph 4 point N of Policy S21 that requires 'opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt will be included as part of any new development proposals in accordance with Green Belt Policy SP11'.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0060	B022	<p>Delete proposed safeguarded land.</p> <p>If the employment land guideline justifies it, allocate sites SHF018a/P14 and safeguard SHF018b.</p> <p>Identify proposed allocation SHF015/029 and land north of Upton Lane (below the skyline) as safeguarded land.</p>	<p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. These proposals and the evidence supporting the strategy have been made available for consultation at a number of stages during the preparation of the Local Plan.</p>	No
A0060	B023	<p>Need to understand how SC intend to mitigate the resulting impacts caused from the proposed Green Belt release on the wider landscape. Surely the openness of Green Belt will not be retained, so we are not sure why para 4n has been included.</p>	<p>Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site. In identifying proposed site allocations a comprehensive site assessment process has been undertaken. The comprehensive site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. The site assessment process also included consideration of landscape/visual amenity and strategic issues such as the relationship to the existing built form. Indeed, the extent of the proposed strategic site has been informed by consideration of the need to maintain an appropriate gap between RAF Cosford and Albrighton. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Furthermore proposed site guidelines recognise the need to make compensatory improvements to the Green Belt, consistent with national policy, including through appropriate additional planting to improve visual amenity and biodiversity and creation of linkages to green infrastructure networks and corridors beyond the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0060	B024	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 Midlands Air Ambulance	No	No	Not Specified	Note that the MAAC site is being promoted as part of the RAF Cosford Strategic Site and not as a one-off allocation for the MAAC. SC have no controls to ensure that the site is only developed for MAAC (consistent with earlier concerns about alternative employment uses of RAF Cosford). The proposed Midland Air Ambulance Charity (MAAC) site is given different references within different documents - contrary to Gunning Principles. The size of the site is also unclear. If it can be established there is an overriding need for MAAC to relocate here/no alternatives outside the Green Belt or within RAF Cosford and the site is the minimum size needed, then the site should not be included as part of the RAF Cosford Strategic Site, but given a separate and specific allocation (Green Belt status could be retained over the site to protect from alternative development now or in the future, this is the approach taken at the M54 service area at Junction 4 and current RAF Cosford) or it could demonstrate very special circumstances through the Planning Application process, enabling stronger planning controls. Planning permission has now been granted as an exception for MAAC in the Green Belt, so this site no longer needs removing from the Green Belt or provided as a strategic allocation.
A0061	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S9.1 Development Strategy: Highley Key Centre	Not Specified	Not Specified	Not Specified	1. Consultation has not been carried out to agreed procedures. The Parish Council were consulted only once and there has been no public involvement. It is unclear how proposals have been arrived at. At a public meeting in Autumn 2019, only one option for the development of the town was presented. The community should be directly consulted and inform proposals and have requested such meetings on a number of occasions. Incorrect information has been provided. The community acknowledges the need to accommodate a fair share of housing, but consider there are better options than that proposed. 2. Site HNN014 has twice been subject to refused Planning Applications. A third Planning Application was then granted - consider this was due to its relationship to the proposed allocation at HNN016 (shared access - which is considered to be located on a dangerous bend with chevrons, where numerous accidents have occurred and vehicles have difficulty passing without mounting pavements used by school children) and threat of judicial review. Conditions on this Planning Application require a pedestrian crossing, although no appropriate location has been identified. Occupiers of HNN014 cannot safely get into town without this crossing. 3. Access to proposed allocation HNN016 is inappropriate for the level of development proposed. The site is subject to an Article 4 Direction, made in 2002, which requires Planning Permission to be granted for the erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure. A strip of agricultural land will lie between the site and existing residential dwellings. A central valley through the middle of the site (25-30% of the site) is made-up ground and liable to slip. 4. Consider site HNN010 is a better alternative. It has better access to services and facilities, an appropriate access is available which has been documented by the site promoter, it could achieve a 50 bed care home, new medical centre, approximately 60-70 affordable properties, provide unfettered access/expansion land for the sewage treatment works and provide improvement pedestrian links to the school. Land could be released in phases for development.
A0062	B001	No Part B received	No Part B received	No Part B received	No Part B received	No Part B received	No Part B received

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0060	B024	The proposed site for the MAAC no longer needs removing from the Green Belt or provided as a strategic allocation.	<p>Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site, including the aspirations of the Midland Air Ambulance Charity.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken. Within this assessment process it is considered that the MAAC is appropriately referenced to reflect its assessment, initially in isolation (within the Strategic Land Availability Assessment) and subsequently as part of a wider potential strategic site (within the assessment of potential strategic sites). The comprehensive site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0061	B001	Removed proposed allocation HNN016 and instead allocate site HNN010.	<p>1. Noted. Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and national legislation. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>In identifying proposed site allocations, a comprehensive site assessment process has been undertaken. This considers a range of sites that have been identified in and around Highley and explains the reasoning for proposed allocations. This site assessment process was first published alongside the 'Preferred Sites' Consultation and has since been updated to inform the consultation on the 'Regulation 18: Pre-Submission Draft of the Shropshire Local Plan' and the 'Regulation 19: Pre-Submission Draft of the Shropshire Local Plan'. The most recent iteration of the site assessment process form appendices of the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.</p> <p>2. Planning Application 20/00193/FUL on site HNN014 was determined on its own merits, using the current Local Plan as the starting point for the decision making process. The Committee Report for this Planning Application is available on the Shropshire Council Planning Portal. Due to the stage of preparation, the draft Shropshire Local Plan carried no weight in the decision making process for this Planning Application.</p> <p>3 and 4. Noted. In identifying proposed site allocations, a proportionate and robust site assessment process has been undertaken. This considers a range of sites that have been identified in and around Highley, including site HNN010 and other land in this vicinity, and explains the reasoning for proposed allocations. The site assessment process was informed by comments provided by highway officers and it is not considered that the Article 4 Direction restricts the ability to allocate the land for development or the development of the land for the uses proposed to occur. Draft Policy DP18 addresses circumstances where there is known or high likelihood of ground instability.</p>	No
A0062	B001	No Part B received	No Part B received	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0063	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2. Community Hubs: Wem Place Plan Area	Not Specified	No	Not Specified	Outdated information used
A0064	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2. Community Hubs: Wem Place Plan Area	Not Specified	No	Not Specified	Information used to determine Clive's score of 54 and status as a Hub is incorrect. Council have previously not properly acknowledged that the identified bowling green is private and shop is closed and would not be financially viable to reopen . Decision should only be based on current status of these facilities



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0063	B001	Assessment to take into account loss of village services/facilities	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0064	B001	Take into account changes to available services/facilities & accept that insufficient points for Hub status	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply.</p> <p>As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0065	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2. Community Hubs: Wem Place Plan Area	No	No	No	Clive does not qualify as a Hub as some of its services are no longer available i.e. bowling green and shop both closed 18 months ago and October 2020 respectively. Shop not viable.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0065	B001	Clive a small village which should not have Hub status as some identified services are no longer available and infrastructure cannot accommodate new development, in particular resulting in pedestrian/ road safety issues.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0066	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2. Community Hubs: Wem Place Plan Area	No	No	Not Specified	Information used to determine Clive's points allocation and status as a Hub is incorrect- bowling green and shop no longer available



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0066	B001	Recalculate score for Clive to reflect unavailable services & lower its score to 47 and thus Hub status incorrect. Reclassify Clive as open countryside.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0067	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.28	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0067	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0068	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.29	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>
A0069	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2 Bucknell BKL008a	No	No	No	<p>Not legally as brownfield sites are not being considered first as per NPPF para 118c. Unsound as site was removed then reintroduced but its implied delivery contradicts App 7. Fails DtC as there has been no cooperation with the Bucknell residents.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0068	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council also consider that the development strategy proposed for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No
A0069	B001	None	<p>Bucknell is appropriately designated as a Community Hub on the size of the settlement and the services and facilities it provides. Shropshire Council considers that the proposed development strategy for Bucknell and the existing and proposed allocations which contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Proposed site allocations have been informed by a proportionate and robust site assessment process. The settlement strategy for Bucknell, which is clearly explained in the Draft Local Plan, was consistently presented in consultations during its preparation. New housing allocation BKLO08a for 20 dwellings was identified in the Preferred Sites consultation in 2018 and presented in subsequent consultations. Site BKLO08a will supplement the saved SAMDev brownfield housing and employment allocation at BUCK001/BKLO11 which already forms part of the housing land supply in Bucknell. The Council considered local representations recommending a further extension to BUCK001 but this site was extended to 70 dwellings in the SAMDev Plan and a further extension may affect its viability in the village of Bucknell. Further site options in Bucknell are influenced by the Area of Outstanding Natural Beauty and the Bucknell Conservation Area that cover the centre and west of the village. Site BKLO08a on the east of the village lies beyond these two protective designations and provides an appropriate location for further modest housing development to meet a revised housing requirement for 110 dwellings which represents a modest increase from the previous figure of 100 dwellings. The delivery of BUCK001 and BKLO08a is currently affected by the protection of the River Clun Special Area of Conservation (SAC) due to the water quality in the river. Site BKLO08a could be delivered quickly as a smaller, greenfield allocation to refresh the housing market when the issues connected with the protection of the SAC are resolved but currently these issues will defer the delivery of new housing in Bucknell.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0070	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.
A0070	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '.. will make provision for the needs of the town and surrounding hinterland...'? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?
A0070	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.
A0070	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0070	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No
A0070	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0070	B003	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0070	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. Shropshire Council has undertaken an Economic Development Needs Assessment and Employment Land Review to inform the Local Plan Review. The Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Specifically with regard to employment land, this proposed strategy provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Having a supply of land which creates choice and competition in the market provides flexibility to respond to changing circumstances.</p> <p>Employment allocations are specifically allocated for employment purposes. Draft Policy SP13 indicates that allocated employment land will be protected for employment generating uses and alternative uses will only be supported in specific circumstances, as documented within the draft Policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0070	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site.</p> <p>Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18.</p> <p>It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated?</p> <p>BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.</p>
A0070	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan.</p> <p>Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment.</p> <p>Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458.</p> <p>Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network.</p> <p>The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.</p>
A0070	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference?</p> <p>Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters?</p> <p>Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?</p>
A0070	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published?</p> <p>Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated.</p> <p>There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth?</p> <p>BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0070	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0070	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0070	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0070	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0071	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	Not Specified	Not Specified	<p>Neither 'Gunning Principles' for consultation nor requirements of the 'Statement of Community Involvement' have been adequately followed.</p> <p>Concern over compliance with 'Gunning Principles' are:</p> <ul style="list-style-type: none"> <li>-Proposals should be consulted upon at a formative stage. BRD030 (Tasley Garden Village) was introduced in April 2020 as a complete proposal. At this late stage, there was no time for meaningful input.</li> <li>-There should be sufficient information for intelligent consideration. Do not consider information provided by the promoters of BRD030 was sufficient to allow informed comments.</li> <li>-There should be adequate time for consideration and response. Promoters of BRD030 undertook consultation which closed on 3rd June 2020 following a single video conference call that a number of Councillors attempted to join without success. A Subsequent 'Regulation 18' consultation by Shropshire Council, which included BRD030 as a revised proposed allocation, presented much less opportunity for public engagement than the previous Regulation 18 consultation which included an alternative preferred allocation (P54 (part); P56 (part); P58a; STC002; STC004 (part); STC005; and STC006) (Stanmore Garden Village). Do not consider the time or process used for consultation was adequate.</li> <li>-'Conscientious consideration' must be given to consultation responses before a decision is reached. No feedback on how submissions have been taken into account has been provided by Shropshire Council.</li> </ul> <p>Concern over compliance with the 'Statement of Community Involvement' are:</p> <ul style="list-style-type: none"> <li>-Shropshire Council have not 'engaged in a timely and constructive manner'. Do not consider sufficient time was allowed for consideration of proposed allocation BRD030. Consultation was inadequate, not allowing opportunities for discussions with Shropshire Council. Development of this scale would only be supported where adequate planning of required infrastructure and funding of infrastructure has occurred. No feedback has been provided on this at any stage of the consultation and the draft Shropshire Local Plan and supporting evidence do not address it.</li> <li>-Consider Shropshire Council simply listing submissions to the Reg 18 consultation does not meet the SCI's requirement to "provide information on how people's views have been handled, including reporting back to communities...".</li> </ul>
A0071	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030 DP25. Infrastructure Provision	Not Specified	No	Not Specified	<p>Concerned whether the draft Shropshire Local Plan is effective and fully deliverable over the proposed Plan period. Following concerns represent a risk to delivery of planned level of housing/employment growth and their successful integration into Bridgnorth:</p> <ul style="list-style-type: none"> <li>-Allocation of either proposed allocation BRD030 (Tasley Garden Village) or previously proposed site at Stanmore Garden Village involve significant development over a prolonged period (during the Local Plan period and beyond) and beyond existing development boundaries.</li> <li>-Proposals involve significant re-shaping of Bridgnorth, but do not involve a whole town approach to shaping the towns future with regard to planning for facilities and infrastructure, as proposals largely seem to be viewed in isolation.</li> <li>-Local infrastructure is already strained (town and wider area) with lack of electrical capacity for employment sites, lack of high-speed broadband, poor mobile signal and traffic and transport issues including congestion, bottlenecks, connectivity issues, lack of town centre parking and high levels of pollution. Acknowledge a Strategic Transport Assessment is being undertaken for Bridgnorth, consider this will identify need for significant infrastructure improvements (town and wider area), if Bridgnorth growth is to pursued successfully.</li> <li>-Expect a comprehensive infrastructure plan and local transport plan (identifying how sustainable transport - walking, cycling and public transport will be developed in the Bridgnorth area). Neither are available to support this consultation.</li> <li>-Lack of clearly identified demand for the scale of residential development proposed and for employers to base themselves in the town, given its lack of connectivity. Track record of housing delivery is 'patchy' at best and delivery of new employment low.</li> <li>-Bridgnorth's employment is concentrated on the east of the town (Stourbridge Road and Stanmore Industrial Estate). Welcome facilitation of further employment development in this area (capitalising on existing local skills in some sectors), albeit this involves release of Green Belt land and a creates a need for compensating measures. However, concerned that a significant element of planned employment delivery relies additional employment development at Tasley, to the west of the town, where there is no previous experience of significant employment development and further from links to the West Midlands conurbation and main (inadequate) links to Telford (north) and Kidderminster (south).</li> <li>-Consider making Tasley (where BRD030 is located) the major focus for residential development is less sustainable, in terms of the impact on local infrastructure, and more expensive in terms of improvements needed.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0071	B001	<p>Reduce the level of growth around Bridgnorth through to about 2032 and set outline targets for growth beyond that date.</p> <p>Undertake a new site assessment process.</p> <p>This would allow the development of the Local Plan to be completed in a legally compliant manner, overcoming in particular lack of consultation resulting from the late introduction of proposed allocation BRD030 (Tasley Garden Village).</p>	<p>Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Shropshire Council also considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Each stage of consultation has been supported by a proportionate evidence base. Following each of these stages of consultation, a summary of the responses received has been prepared and form appendices to the Consultation Statement prepared for the 'Regulation 19' Pre Submission Draft of the Shropshire Local Plan.</p> <p>With regard to proposed allocation BRD030 (Tasley Garden Village), this site was identified as a proposed allocation and subject to consultation within the 'Regulation 18' Plan Preparation stage of the Local Plan Review - specifically, within the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (August 2020 – September 2020).</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>Where following consultation it has been proposed to make amendments to proposals in response to the consultation process or indeed any other emerging evidence, this has been documented within relevant subsequent consultation documents (reflecting the iterative process undertaken during the Regulation 18 Plan Preparation stage). Furthermore where such changes relate to proposed allocations (which have been the subject of the most significant level of response) this has also been documented within updated site assessments, provided as part of the evidence and consultation material for relevant stages of consultation.</p>	No
A0071	B002	<p>Undertake an analysis of infrastructure and urban capacity in Bridgnorth. Identify proposals to address any identified issues, including how improvements will be funded.</p> <p>Reduce the rate of planned housing and employment development. Rates can be increased in future iterations of the Local Plan once successful development and integration into the town have been demonstrated.</p> <p>Reflect preference of Bridgnorth Town Council for development of the site at BRD032 (Revised Stanmore Garden Village) rather than that of the proposed allocation at BRD030 (Tasley Garden Village).</p> <p>Reassess suitability of both the above sites for short to medium term development in the light of infrastructure and transport assessments.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It is acknowledged the proposed development strategy for Bridgnorth involves development beyond the current Development Boundary within the adopted Local Plan. However, the Local Plan Review is the appropriate mechanism for considering amendments to development boundaries and the amendments proposed are considered appropriate to achieve the proposed development strategy for the town. It should also be noted that proposed amendments to Development Boundaries are not unique to Bridgnorth and as already referenced proposed site allocations have been informed by a proportionate and robust site assessment process.</p> <p>Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements/further studies which may need to be undertaken at the Planning Application stage, to inform development proposals for a site.</p> <p>As part of the Local Plan Review process, Shropshire Council has engaged with key infrastructure providers and prepared/considered evidence on infrastructure capacity and needs as appropriate to inform proposed policies, including development strategies for specific settlements, and proposed allocations. The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p> <p>The proposed development strategy for Bridgnorth provides an opportunity to expand and capitalise on the unique characteristics of Stanmore Industrial Estate. However it also proposes to allocated land for a new employment site to the west of the town, cross-subsidised by proposed residential development, in proximity to the current employment allocation.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0071	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and SP3	Not Specified	No	Not Specified	<p>Do not consider the draft Shropshire Local Plan is justified as an appropriate strategy, taking into account reasonable alternatives and proportionate evidence.</p> <p>-The draft Shropshire Local Plan proposes 1,800 dwellings and 49ha of employment land in Bridgnorth between 2016 and 2038. Excluding completions already achieved and existing commitments there is a need for an additional 1,700 dwellings and 35ha of employment land. Guideline is reliant on the existing SAMDev Plan allocations with capacity for 500 dwellings and 13.3ha of employment land, which have as at January 2021, not been the subject of a Planning Application.</p> <p>-Proposals for Bridgnorth are a material element proposals for Shropshire (equating to just under 6% of proposed residential development and over 16% of employment land). Understand an element of employment land provision in Bridgnorth is to provide choice and competition in the local market, whilst this may be beneficial, it suggests some may not be delivered during the proposed Local Plan period.</p> <p>-Demographically, Shropshire's population and workforce is not self-sufficient, with population growth reliant on in-migration. 2014-based sub-national household projections (SNHP) project between 2016 and 2038, households numbers in Shropshire will grow by 19,136, whilst household size is expected to reduce. Estimate that 7,965 of this household growth results from reduction of household size and 11,171 result from population growth (driven by in-migration). The draft Shropshire Local Plan proposes an increase of 30,800 dwellings between 2016 and 2038, 11,664 dwellings (61%) more than needed to meet ONS projections - estimate this proposal would accommodate an additional 27,000 people.</p> <p>-Level of employment land proposed seems to be based on an assumption of 1 new job per dwelling, but we are concerned about the feasibility of this, given (even after allowing for in migration), as 'working age' (16-64) population of Shropshire is projected to decline by about 12,500 people.</p> <p>-No separate demographic projections are available for the Bridgnorth area, however it has a slightly higher age structure than Shropshire as a whole, so would expect a similar picture. Household and employment growth aspirations for Bridgnorth area largely reflect a desire to attract new people into the area as part of the wider Shropshire growth strategy.</p> <p>-Proposals for Bridgnorth represent a step-change in pace of development and opening-up of a significant areas of countryside on the edge of the town (separated from it by the A458). Not aware of evidence of market capacity for this level of development nor of an assessment of the strengths and weaknesses of Bridgnorth (re-shaped by this development) to attract new residents in competition with other areas. Unlike for employment, there is no provision for choice and competition in the market.</p> <p>-Consider the choice of sites for development at Bridgnorth (excluding those for expansion of Stanmore Industrial Estate) has been heavily influenced by an aspiration to achieve a single large development. Would like to see evidence that development across a number of sites has been adequately explored.</p> <p>-'Regulation 18' consultations have occurred for BRD030 (Tasley Garden Village) and Stanmore Garden Village, however these were separate consultations and used different mechanisms (consultation on BRD030 was limited to an online consultation due to the Covid-19 pandemic). Despite this a substantial volume of submissions were made and there is no publicly available evidence of how views have been taken into account. Consider consultation is not in-line with the 'Gunning Principles'.</p>
A0072	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	Not Specified	Not Specified	Not Specified	More focus should be on energy efficiency of, and energy production in new homes
A0073	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	<p>Object to use of the word 'around' for the housing requirement. Para 59 of the National Planning Policy Framework (NPPF) seeks to 'boost significantly' the supply of housing land, furthermore given the aspirations established in paras 3.6 and 3.7 of the draft Shropshire Local Plan, the housing requirement should be a minimum. Examinations of the draft Lichfield Local Plan and Middlesbrough Local Plans concluded housing requirements should be a minimum.</p> <p>Agree there is clear justification for a housing requirement that exceeds the local housing need calculated using Government's standard methodology, given economic strategy/ambitions, affordable housing need, and allowance for meeting any unmet needs from the Black Country.</p> <p>However, calculation of local housing need does not consider 2018-based sub-national household projections (SNHP), which indicated 1,644 households per annum. Furthermore, whilst the Local Housing Need is currently based on the 2014-based SNHP, Government recently consulted on proposed changes to the standard method for calculating local housing need which used 2018-based SNHP and resulted in a local housing need of 2,129 dwellings per annum, which exceeds the proposed housing requirement by approximately 50%. It should be noted that need may therefore increase during the proposed Plan period which may require a review of the Local Plan.</p> <p>Para 73 of the NPPF requires a housing trajectory to be included within the draft Shropshire Local Plan, this has not occurred.</p> <p>Total housing supply identified in Appendix 5 amounts to approximately 27,750 dwellings, whilst proposed strategic settlements are identified to deliver a further 1,750 dwellings (do not disagree with inclusion of these sites, but delivery expectations need to be realistic). However this leaves a shortfall of approximately 1,300 dwellings (just under 1 years supply). Even if this shortfall can be accounted for through other rural windfall completions / windfalls, there does not appear to be any flexibility within the supply to deal with rapid change and ensure a continued 5 year supply.</p> <p>Support designation of Market Drayton as a Principal Centre. However, consider it could accommodate a greater proportion of development than is currently proposed in the draft plan.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0071	B003	<p>Reduce the proposed housing requirement to some 26,000 dwellings (1,180 dwellings per annum) between 2016-2038, aligning with the identified Local Housing Need. If evidence of demand and deliverability of a higher level of growth emerges, this can be accommodated in future revisions of the Local Plan.</p> <p>Reduce the proposed housing guideline for Bridgnorth by 500 dwellings.</p> <p>Undertake an assessment of realistically achievable housing and employment levels.</p> <p>Undertake a housing need assessment for Bridgnorth. Demonstrate how this need (particularly for smaller and affordable homes) can be met.</p> <p>Produce evidence of the availability of sites other than BRD030 (Tasley Garden Village) and document why they should not be allowed to proceed.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>The proposed housing requirement for Shropshire of around 30,800 dwellings over the proposed plan period from 2016 to 2038 will meet housing need and support the long-term sustainability of the County. It also provides some flexibility to respond to changes to local housing over the plan period and an opportunity to respond to other identified factors.</p> <p>The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan.</p> <p>The proposed employment land requirement incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are also appropriate, effective, sustainable and deliverable.</p> <p>Identification of proposed site allocations for Bridgnorth has been informed by a proportionate and robust site assessment process, which considers all options for development identified in and around Bridgnorth, including sites identified through a 'call for sites' and any sites identified through the Local Plan Review process.</p> <p>With regard to consultation processes, please see response to A0071-B002.</p>	No
A0072	B001	<p>The policies in the document could be strengthened by the adoption and inclusion of the Merton Rule (requiring new developments to generate at least 10% of their energy needs from on-site renewable sources). The risk of fuel poverty could be reduced and fewer carbon emissions could be achieved by increasing the standard of insulation in new homes. Such policies would be progressive.</p>	<p>Policy DP11 includes a requirement for new development to provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources. No change proposed.</p>	No
A0073	B001	<p>Remove use of "around" and replace with "minimum."</p> <p>Prepare a housing trajectory for inclusion within the draft Shropshire Local Plan.</p> <p>Ensure sufficient supply of deliverable sites to meet the housing requirement/maintain a 5 year housing land supply.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. It is considered that the proposed housing requirement and phraseology used in relation to the housing requirement is appropriate and will 'significantly boost' housing supply.</p> <p>Government has recently consulted upon potential changes to the methodology for calculating LHN, including the potential use of the 2018-based sub-national household projections (SNHP). As a result of this consultation Government determined that it was most appropriate to retain the use of the 2014-based SNHP for this calculation. Furthermore, in responding to this Consultation, Shropshire Council indicated its significant concerns regarding the 2018-based SNHP, particularly with regard to their reliance on the 2018-based sub-national population projections (SNPP) which utilised only 2-years of internal migration data in their formulation.</p> <p>As specified within the explanation to draft Policy SP2, whilst it is acknowledged that there will inevitably be fluctuations over time, which may result in annual rates of delivery falling below or exceeding this level, it is expected that this will 'balance out' to ensure that the housing requirement is achieved. As such, it is considered that this expected rate of delivery over the Local Plan period of around 1,400 dwellings per annum forms the most robust trajectory of future housing delivery in Shropshire and will be used to assess annual housing delivery.</p> <p>Shropshire Council also considers that it has a robust five year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. Appendix 5 illustrates this supply - identified completions, commitments (including existing and proposed allocations) and appropriate windfall allowances (for settlements with development guidelines), which totals around 31,000 dwellings (excluding any windfall allowance for the wider rural area).</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0073	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	Not Specified	Not Specified	<p>The Strategic Housing Market Assessment (SHMA) (2020) analyses housing need broken down by size, type and tenure, however there are several problems with this:</p> <ul style="list-style-type: none"> <li>-Assessment is based on the 2014-based sub-national household projections (SNHP), this does not correlate with the proposed housing requirement (which is just over 400 dwelling per annum higher). Cannot assume the need for this additional housing is a similar mix to the elements of household growth assessed.</li> <li>-It does not assess housing need by size, type and tenure for different settlements.</li> <li>-It fails to adequately consider market trends and demand.</li> </ul> <p>With regard to use of the Right Home Right Place Surveys in para 2a, they are innovative but not considered sufficiently robust to determine the mix of 50% of housing on a site.</p> <p>With regard to para 2b, the mix proposed does not reflect the SHMA, with too high a level of 2 bed housing proposed. It is also unclear why a similar proportion is not proposed for 4+ houses, given their important role in meeting need.</p> <p>As such the dwelling mix in draft Policy DP1 should be a starting point only, to be applied flexibly, reflecting local needs and market demand. For the Plan to be sound, sound, a far more flexible policy approach is needed which properly reflects the nature of the evidence base, which has inherent demographic limitations and cannot fully reflect market demand and people's aspirations.</p> <p>The SHMA does not support the proposed requirement for 70% of new dwellings to meet M4(2) standard as it indicates that some of the need for M4(2) standard can be met within M4(1) standard housing (standard building control requirement). Furthermore the SHMA also assumes that only 53% of Shropshire households in current or future housing need due to a long-term health or physical disability (LTHPD) could be absorbed by converting existing properties to bring them up to M4(1) standard, however it fails to recognise that part of the remaining need can be met within existing M4(1) housing or properties which can be brought up to M4(1) standard. The SHMA also recognises part of this need can be met within specialist accommodation. Even if the upper need identified is realised and none of this need is met within existing stock, building new homes to M4(2) or (3) standard, does not mean they meet these needs, as there is significant demand for new housing from other elements of the population and many households may choose to stay in existing homes anyway. Other Local Authorities (Central Lincolnshire 30% and Harrogate 25%) have set much lower requirements.</p> <p>Draft Policy DP1's requirements for M4(3) housing is inconsistent with the NPPG which states wheelchair accessible homes (i.e. M4(3) standard) should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (i.e. certain types of affordable housing). Policy should only apply to this element of affordable housing. The Shropshire Viability Study assumes that this is the case. However the Viability Study also illustrates viability in many parts of the county is challenging, with the level of affordable housing proposed based on 'on-the-ground' experience before these sort of policy requirements, rather than the result of the assessment.</p> <p>Do not consider that the tests of necessity and viability as set out in the NPPG have been met in relation to the proposed requirements for M4(2) and M4(3) standard dwellings.</p> <p>Draft Policy DP1(6) requires housing, including older persons accommodation and specialist dwellings to meet the needs of those with disabilities and special needs, on all sites of 50 or more dwellings.</p> <p>Recognise the need for specialist accommodation in Shropshire, as demonstrated by the SHMA, but have concerns as to how the draft policy would operate in practice. It does not specify an amount for specific sites and achieving a range on sites of less than 200-250 would be very challenging. Sites of less than 250 would likely be developed by a single developer unlikely to be able to deliver a care home or extra care accommodation, although this could be balanced by some small sites being developed specifically by care providers and being 100% of this type. Therefore consider that the draft policy should be amended so that on sites of below 250 dwellings, the provision of specialist housing is not obligatory, but could be encouraged, whilst for large strategic sites of 250+ dwellings the requirement for specialist housing to be provided as part of an appropriate mix could be retained. Specific requirements could also be set out for sites where specialist accommodation would be appropriate in part or whole, having regard to the suitability of individual sites and any specific locational needs.</p>
A0073	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	Not Specified	Not Specified	1(b), 1(c) and 1(d)) are clearly well intentioned, they are inconsistent with national planning policy and guidance
A0073	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Not Specified	Not Specified	Not Specified	<p>Support part 1 of draft Policy DP2.</p> <p>Object to part 2 of draft Policy DP2. The requirement at part 2 of the policy for all sites of 10 or more dwellings to provide 10% of houses as serviced plots for self-build or custom-build development, as the SHMA demonstrates that the likely supply of self-build housing exceeds need. It is also unclear as to whether self-build or custom-build plots on large sites would be attractive to self-builders. This was concluded to be the case in the examination of the Cornwall Local Plan. Smaller sites are better suited to meeting the needs of self-builders and custom-builders.</p> <p>The requirement to market self-build plots for 36 months at a fair valuation is not a reasonable timeframe.</p>
A0073	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Not Specified	Not Specified	Not Specified	To be consistent with national planning policy the draft plan should specify that development should achieve a Biodiversity net gain (BNG). Concerned as to whether the Council has fully assessed the implications of applying 10% BNG on development within Shropshire, including the impact upon the developable areas of site allocations, and potentially development yield.
A0073	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1 Market Drayton	Not Specified	Not Specified	Not Specified	It is not clear from the available evidence base as to why certain settlements are to be apportioned higher levels of growth than other settlements within the same tier of the hierarchy. With 35ha of allocated employment development available in Market Drayton, additional housing development in the settlement would be logical in the context of aligning housing and economic growth and delivering a sustainable pattern of development. Market Drayton could also accommodate any growth which may be undeliverable in Whitchurch.
A0073	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1 Market Drayton MDR012 and MDR034	Not Specified	Not Specified	Not Specified	While the principle of a new marina in the town is supported, the complexity of delivering such a project alongside a housing development means it could be some time before the first homes are occupied. This is reflected in Appendix 7 of the plan, which identifies that the sites will deliver in the medium – long term.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0073	B002	<p>A far more flexible policy approach is needed in relation to the dwelling size mix aspect of draft Policy DP1.</p> <p>Do not consider that the tests of necessity and viability as set out in the NPPG have been met in relation to the proposed requirements for M4(2) and M4(3) standard dwellings within draft Policy DP1. Rates should be removed or reduced.</p> <p>Specialist Housing aspect of draft Policy DP1 should be amended so that on sites of below 250 dwellings, the provision of specialist housing is not obligatory, but could be encouraged. The requirement could be maintained for sites of 250+ dwellings and for appropriate specific sites/locations.</p>	<p>Noted. Shropshire Council considers that the Strategic Housing Market Assessment (SHMA) (2020) is a robust and proportionate evidence base for informing policies on housing need. The SHMA concludes that Shropshire represents a self-contained housing market area (HMA) and as such an appropriate geography for assessing housing need (both in terms of total need and needs of different groups within the community). However, it is recognised that Shropshire is diverse, hence the Right Home, Right Place initiative, which is referenced within draft Policy DP1. Furthermore, whilst the assessment within the SHMA is based on housing need rather than the policy-on proposed housing requirement, it is considered appropriate to assume the profile of housing need by size, type and tenure would be consistent, indeed there is no evidence available to suggest otherwise.</p> <p>It is considered that para's 2a/b of draft Policy DP1 provide an appropriate balance between ensuring that new development will include an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) about housing mix requirements, and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand.</p> <p>The threshold for housing with 2 bedrooms or less with para 2b of draft Policy DP2 of course includes both 1 and 2 bedroom properties, which together represent more than 25% of the housing need, as identified within the SHMA.</p> <p>With regard to the requirements for M4(2) housing, the SHMA identifies that growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the Local Plan period from 2016 to 2038. It then calculates a total need for M4(2) and M4(3) housing equivalent to 77% of total household growth (of which M4(3) constitutes around 13%). Need for these forms of properties would not be met by existing or new M4(1) housing (within the assessment a precautionary approach is taken when considering the ability to adapt existing dwelling stock. Specifically as no information is available either locally or nationally on the proportion of existing dwelling stock that can be adopted to M4(2) standard and no information is available locally on the proportion of existing dwelling stock that can be adopted to M4(1) standard, we have considered national data on the proportion of existing dwellings that can be adopted to M4(1) standard and assumed that these same dwellings could be converted to M4(2) standard, however this is in no way implying that M4(1) standard housing would meet the needs of those requiring M4(2) standard housing. It is acknowledged that this approach is likely to over-estimate the amount of existing dwelling stock that can actually be adapted to M4(2) standard, but represents best available information. It is also acknowledged that the cost of adapting existing properties can be extremely high, which emphasises the importance of ensuring that an appropriate proportion of new dwellings are constructed to M4(2) and M4(3) standard). It is recognised that part of the identified need can be met within specialist accommodation, however Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible. It is also acknowledged that building properties to M4(2) standard will not mean they are necessarily occupied by those in need, but it is important to ensure that the opportunity exists for households in need to access appropriate properties.</p> <p>With regard to the requirements for M4(3) housing, the SHMA clearly evidences need for M4(3) housing, the threshold proposed within draft Policy DP1 reflect this need and considerations of development viability. The NPPG stipulates that Local Authorities should only require wheelchair accessible homes to those dwellings they are responsible for allocating/nominating a person to live in that dwelling. This is recognised within the Explanation to draft Policy DP1 which states in paras 4.33 and 4.34 "It should be noted that M4(3) (wheelchair user dwellings) standard within Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings. Where dwellings are required to meet M4(3) (wheelchair user dwellings) standard within Building Regulations to comply with this policy, they will normally consist of wheelchair adaptable homes. Wheelchair accessible homes will only be required where Shropshire Council is responsible for nominating a person to live in the dwelling."</p> <p>As such Shropshire Council considers that the SHMA justifies the proposed thresholds for M4(2) and M4(3) standard dwellings.</p> <p>With regard to specialist designed housing (for older people and those with disabilities), it is recognised that sites of 50 or more dwellings will be diverse in nature. It is for this reason that a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors.</p>	No
A0073	B003	These elements of the policy should therefore be deleted	The Council considers that this policy introduces effective and appropriate policy requirements for new development to contribute to reducing impact on climate change, whilst also ensuring compliance with national policy and legislation	No
A0073	B003	<p>Remove requirement for all sites of 10 or more dwellings to provide 10% of houses as serviced plots for self-build development.</p> <p>If the above requirement is retained, reduce the timescales required for marketing such plots.</p>	<p>Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position.</p> <p>The marketing timescales proposed within the policy are 24 months, rather than 36 months. This is considered appropriate.</p>	No
A0073	B004	Policy DP12(3) should be amended to remove reference to 10%. Clearly if the requirement for 10% BNG is introduced through the Environment Bill, then it will be covered by separate legislation in any event and will not need to be addressed within the Local Plan	A Whole Plan Viability Assessment has been undertaken to inform policy requirements with the intention of ensuring the viability and deliverability of the draft Shropshire Local Plan. Draft Policy DP12 has been subject to due consideration within this assessment. No change proposed.	No
A0073	B005	Whilst we support the identification of Market Drayton as a Principal Centre and the level of growth is broadly supported, we consider that Market Drayton could accommodate a higher level of housing growth. It is a sustainable location for new development, and there are suitable unconstrained sites available for development, in particular to the north of the A53.	It is considered the strategy for Market Drayton is appropriate, effective, sustainable and deliverable. It is recognised the strategy includes a proposal to enable the delivery of a key local objective; to relocate the local sports provision, as well as continuing to provide suitable opportunity for delivering employment provision. It is not considered there is any need to provide additional land in order to support non-delivery in Whitchurch.	No
A0073	B006	To ensure that the Council are able to maintain a five-year supply of housing land, it is important that provision is made through other allocations within Market Drayton for deliverable sites free of constraint, which are capable of coming forward early in the plan period.	Shropshire Council considers that the proposed development strategy for Market Drayton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0073	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1 Market Drayton MDR039 and MDR043	Not Specified	Not Specified	Not Specified	The delivery of the site for the playing fields is reliant upon land in third party ownership, and furthermore any planning application involving the provision of new playing fields is likely to be extremely complex. It is not clear whether there is sufficient evidence to justify the site being identified for delivery within the short term, as suggested in Appendix 7 of the draft plan.
A0073	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1 Market Drayton MDR006	Not Specified	Not Specified	Not Specified	Strong support for this site. The draft allocation is for approximately 125 dwellings. We consider that this quantum of development is realistic and is therefore supported.
A0073	B009	Sustainability Appraisal	Sustainability Appraisal Appendix L: Market Drayton MDR006	Not Specified	Not Specified	Not Specified	SA incorrectly assess MDR006 as being best and most versatile agricultural land.
A0074	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	Yes	Yes	Yes	n/a
A0075	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	Not Specified	Not Specified	Not Specified	This plan is looking at sustainability and development. The actions of Shropshire Council have left behind unfinished housing sites and misery in some areas. This should be addressed before any further mistakes and misery occurs.
A0076	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Shifnal SHF018b & SHF018d	Yes	Yes	Not Specified	Support this site and its removal from the Green Belt
A0077	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Longden	Not Specified	No	Not Specified	Do not consider the draft Shropshire Local Plan is sound or sustainable. Do not agree with the methodology adopted in the Hierarchy Assessment as applied to Longden. Specific concerns addressed within the Longden Village Action Group (LVAG) Regulation 18 response. Obtaining the same level of points for a permeant and mobile library is inappropriate. Unclear why sites previously rejected/refused at appeal are considered.
A0078	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1(2b)	Not Specified	No	Not Specified	Understand and support requirement to provide a mix of dwelling types to satisfy local needs and in most cases (unless evidence indicates otherwise) at least 50% 3 bedroom dwellings. However, object to the proposal that a minimum of 25% of dwellings should be 2 bedroom or less as this does not meet Shropshire's development needs and is not justified by proportionate evidence: -Our experience is that in most parts of Shropshire demand for 2 bedroomed houses is limited and has diminished further in recent years (examples of development schemes provided within representation). -Demand for 2 bedroom properties is generally from investors who perceive their rent yield as better than larger properties. Not suggesting this does not contribute to the overall housing market, but Government policy is to increase home ownership. -Registered Providers generally require a minimum of 65% 3 bed homes with the balance being 2 bed homes for affordable housing provided under S106 legal agreements. -Understand Council wants a large provision of 2 bedroom properties to ensure homes are affordable to lower income earners, however the difference between 2 and 3 bedroom properties is around 10% and most were willing to pay the higher amount to secure the extra bedroom. -Trends in working from home (accelerated by Covid 19) increase the need for the additional space. -2 bedroom properties are less efficient use of land.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0073	B007	Having regard to the above considerations, it is important that provision is made through other allocations within Market Drayton for deliverable sites free of constraint, which are capable of coming forward early in the plan period.	Shropshire Council considers that the proposed development strategy for Market Drayton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.	No
A0073	B008	The capacity could be increased if the Council considered that a higher density development would be more appropriate.	Para 7 of Draft Policy S11.1 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage. The draft site guidelines for proposed allocations are also considered appropriate.	No
A0073	B009	Agri-land should be considered to be sub-grade 3B, and negative score amended to 0.	The SA does not differentiate between Grade 3a and 3b agricultural land - Grade 3 is all that is assessed. The site is on Grade 3 land so the assessment is correct. No change.	No
A0074	B001	n/a	Noted.	No
A0075	B001	n/a	It is considered that the draft Shropshire Local Plan provides an appropriate vision and framework for the future development of Shropshire to 2038; addresses needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seeks to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design.	No
A0076	B001	n/a	Shropshire Council welcomes the support for the proposed allocation of sites SHF018b and SHF018d for employment development in Shifnal in the period to 2038 as evidence of the soundness of the Local Plan.	No
A0077	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden. As such it is considered appropriate for Longden to be identified as a proposed Community Hub. However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.	No
A0078	B001	Object to the inclusion of a minimum provision of 2 bedroom houses and suggest this aspect of the policy is removed. If it is thought desirable that a minimum proportion of homes should be 2 bedroom, this should be reduced to 10%.	Noted. The housing mix proposed within para 2b of draft Policy DP1 is informed by the Strategic Housing Market Assessment (SHMA) undertaken to inform the Local Plan Review. Analysis within the SHMA indicates a significant proportion of the new dwellings required during the proposed Plan period will be 1, 2 and 3 bedrooms in size. Specifically, the SHMA indicates around 32.7% of the dwellings needed will be 1 or 2 bedrooms in size and a further 43.5% will be 3 bedrooms in size. This demand for 1, 2 and 3 bedroom dwellings also reflects the view often expressed by local communities when discussing their local housing needs. As such, where an appropriate Local Housing Need survey has not been undertaken in the last 5 years, it is considered appropriate that developments of 5 or more dwellings include at least 25% of open market dwellings as 2 bedroom or less and a further 25% to be three bedroom or less, on sites of 5 or more dwellings. The remainder of the open market dwellings will include a suitable mix and variety of dwelling sizes.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0078	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1(3)	Not Specified	No	Not Specified	Support principle of requiring national space standards. However consider para 3 of draft Policy DP1 is unsound in differentiating between market and affordable dwellings. The draft Policy should be more prescriptive for open market dwellings, stating national space standards will apply unless specific considerations justify otherwise (such as conversion schemes or developments targeted at specific user groups). The proposed requirement that affordable homes should comply with space standards and that open market housing does not have to, contradicts draft Policy DP3 which requires affordable and open market homes to be indistinguishable. In this respect policy DP1.3 is also unsound.
A0078	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1(5)	Not Specified	No	Not Specified	Object to the proposed requirement within para 5 of draft Policy DP1, that 70% of dwellings should comply with M4(2) and 5% M4(3) standard. This is above and beyond current Building Regulations and is not based on proportionate evidence, so is unsound. This requirement will undermine development viability and query whether there is real demand for this type of provision. Suggest use of mandatory space standards instead, which provide a reasonable level of wheelchair and disabled accessibility.
A0078	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1(6a)	Not Specified	No	Not Specified	Strongly object to para 6 of draft Policy DP2 as it will undermine viability, delivery and adversely affect the ability of the Local Plan to meet its housing targets. It is not based on proportionate evidence and will not be effective or deliverable and as such it unsound. Do not believe it appropriate, logical or viable to require specialist housing of this type to be provided on general market housing sites. This proposed policy requirement is not necessary to ensure adequate provision of specialist housing, which is usually developed and operated by specialist organisations. Suggest the following factors should be considered in respect of this proposed policy: -Generally, due to ability to pay higher residual land values, a supply of suitable sites is likely to be provided by the market. -Many sites are not suitable for provision of specialist housing due to location (access to services), site specific conditions or level of demand. The Council should be required to provide evidence of need for sites. -These forms of specialist housing may qualify as affordable housing and reduce wider affordable housing provision. -It will deter small and medium enterprises from delivering medium sized sites, undermining the ability of the Local Plan to achieve requirements. -For schemes of less than 200 dwellings, to be viable, this would represent a large proportion of the site.
A0078	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3.1c	Not Specified	No	Not Specified	Generally support the proposed Affordable Housing policies but believe para 1.c. of draft Policy DP3 is unsound in that it conflicts with para 1.h. of draft Policy DP3, particularly on larger sites. It may also distort build programmes on smaller sites and be particularly difficult for SME's to accommodate.
A0078	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11(1b, 1c and 1d)	Not Specified	No	Not Specified	Para 1b, 1c and 1d of draft Policy DP11 appear to go beyond the requirements of current building regulations and are unsound. Previous guidance in 'The Code for Sustainable Homes' was withdrawn as that document required dwellings to perform thermally in excess of Building Regulations. Subsequent government guidance confirmed that compliance with the Building Regulations should be considered as appropriate.
A0079	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 2.16 to 2.26	Not Specified	No	Not Specified	Responses to earlier stages of consultation on the Local Plan Review emphatically demonstrate respondents (the views of which are supported by Town and Parish Councils) were opposed to the high level of growth proposed. This undemocratic approach is unsound.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0078	B002	Policy should require all dwellings to comply with national space standards unless specific considerations justify a departure.	Noted. The approach to nationally described space standards proposed within Para 3 of draft Policy DP1 is considered to positively respond to the evidence available within the Strategic Housing Market Assessment (SHMA) and other sources. Providing dwellings with sufficient internal floorspace positively contributes to the future occupier's ability to achieve a high-quality of life and is responsive to changing household requirements, by increasing the ability to include adaptations at a later date. It is not considered that the proposed requirements of draft Policy DP1 and draft Policy DP3 are contradictory, indeed these proposed requirements are considered complementary.	No
A0078	B003	This draft Policy should be deleted. If the Inspector is minded to require a provision of M4(2) housing consider this should be at a much lower level (10%) to ensure adequate provision without undermining viability and deliverability. If the Inspector is minded to require provision of M4(3) housing, the site size threshold should be increased to 20 dwellings, unclear how 5% be applied to sites of less than 20 dwellings?	Noted. The Local Plan Review is informed by a Strategic Housing Market Assessment (SHMA) (2020) and Viability Assessment (2020) which are considered proportionate and robust evidence. Thresholds proposed within draft Policy DP1 reflect consideration of need and development viability. With regard to need, the SHMA identifies that growth the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the Local Plan period from 2016 to 2038. It calculates a total need for M4(2) and M4(3) housing equivalent to 77% of total household growth (of which M4(3) constitutes around 13%). It is recognised that part of this need can be met within specialist accommodation, however Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible. As such Shropshire Council considers that the SHMA justifies the proposed thresholds for M4(2) and M4(3) standard dwellings.	No
A0078	B004	This draft policy should be deleted. If the inspector is minded to retain this draft Policy, the threshold for provision of specialist housing should be increased to 200 dwellings and subject to evidence of need.	Noted. The National Planning Policy Framework (NPPF) specifies that housing needed for different groups in the community should be assessed and reflected in planning policies, this includes the needs of older people. The Strategic Housing Market Assessment (SHMA) indicates that growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the proposed Local Plan period from 2016 to 2038. It also identifies a specific need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision. In order to ensure the needs of older people are met it is considered that there is a need to provide an appropriate range of specialist housing designed to meet the diverse needs of older people. With regard to specialist designed housing (for older people and those with disabilities), it is recognised that sites of 50 or more dwellings will be diverse in nature. It is for this reason that a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors.	No
A0078	B005	Suggest introducing a graduated requirement - e.g. 50% of affordable dwellings to be provided before 50% general market occupancy and 100% before 80% general market occupancy.	Noted. Shropshire Council consider that the proposed Policy requirement of "ensuring applications for development with a requirement to provide affordable housing secure the interest of a Registered Provider, and that the affordable dwellings will be transferred to a Registered Provider as soon as possible, and no later than at completion of 50% of the consented market housing" reflects the current established approach, is appropriate, provides certainty to all parties (including the community, development industry and decision maker) and ensures the timely delivery of affordable housing. Implementation is able to reflect the phased development of larger sites.	No
A0078	B006	Policy should be amended to require all development to comply with the requirements of the Building Regulations prevailing at the time.	Although the government announced its intention to amend Subsection 1 (c) of the 2008 Planning and Energy Act in 2015 - which states that Local Planning Authorities may include policies imposing reasonable requirements for 'development in their area to comply with energy efficiency standards that exceed the energy requirements of the building regulations' - these amendments have not yet been enacted. The intention of the amendment was to introduce higher energy performance requirements through building regulations, rather than the planning system. The performance increase was expected to be a 19% improvement. This improvement is also referenced in national policy through the 2015 Written Ministerial Statement - being equivalent to the Code for Sustainable Homes level 4 energy criteria which the Statement permits. However, the government's 2015 Productivity Plan subsequently stated that 'the government does not intend to proceed with .....the proposed increase in on-site energy efficiency standards, but will keep energy efficiency standards under review recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.' Recent government consultations on the Future Homes Standard and Future Buildings Standard indicate that such a review is ongoing with the outcome forming part of changes to Part L of the Building Regulations. However, these changes have not yet been made. Thus the Council believes that the powers afforded to LPAs through the 2008 Planning and Energy Act to set energy efficiency standards in new homes still exist and that this policy's requirements are appropriate. Provision is also made in the policy for higher Building Regulations standards to apply if/when these are implemented.	No
A0079	B001	Public view should be recognised and housing target lowered significantly	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0080	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.30	Yes	No	No	<p>1. Cressage should remain open countryside is not designated a Hub to ensure no significant housing development will take place in Plan period. This would reflect the view of the majority of residents</p> <p>2. Full needs assessment required to understand what is needed for the village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0080	B001	<p>1.Community Hub status based on flawed scoring system- irregularities &amp; errors in the system need addressing</p> <p>2.Inspector should review the consultation process &amp; consider whether consultation has been satisfactory and appropriate during Covid 19 pandemic restrictions which has impacted on peoples' ability to reply and if previous responses have been properly &amp; fully considered by Shropshire Council</p> <p>3. Countryside Charity's objections should be reviewed in depth by the Inspector</p>	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0081	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2. Community Hubs: Wem Place Plan Area	No	No	No	Unsound & not legally compliant because information used to determine Clive's point score & status as a Hub is incorrect. Bowling green is unavailable and shop permanently closed. Removal of points allocated for these facilities brings Clive below Hub status.
A0082	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2. Community Hubs: Wem Place Plan Area	No	No	No	Unsound & not legally compliant because information used to determine Clive's point score & status as a Hub is incorrect. Bowling green is unavailable and shop permanently closed. Removal of points allocated for these facilities brings Clive below Hub status.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0081	B001	Recalculate score for Clive to reflect unavailable services & apply reduced score under standard methodology which will bring Clive below threshold for Hub status.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0082	B001	Points allocated for Hub status relating to shop and bowling no longer apply. Shop closure permanent and there is an application for change of use to residential	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0083	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.31	Yes	No	No	<p>Cressage should remain open countryside is not designated a Hub to ensure no significant housing development will take place in Plan period which is assumed to be at least 20 years. This would reflect the view of the majority of residents.</p> <p>2.Draft Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing ( lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3.Full needs assessment required to understand what is needed for the village</p> <p>4.Parish Council has not challenged Hub status or accurately represented local view- this should be considered by the Inspector.</p> <p>5.Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given</p> <p>6.Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run . Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7.Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0083	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0084	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2. Community Hubs: Wem Place Plan Area	Not Specified	No	Not Specified	Criteria used to determine Hub status have been ignored. Clive's point allocation & status as a Hub ignores loss of bowling green and shop.
A0085	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2. Community Hubs: Wem Place Plan Area	Not Specified	No	Not Specified	Clive identified as a Hub but some of the identified services & amenities are no longer available i.e. bowling green and shop . Post office service only in village hall up to 4 hours per week, 2 hours currently

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0084	B001	not specified	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0085	B001	Data for Clive should be updated to reflect currently available services	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states ""Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."" With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states ""As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view."" As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities."</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0086	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15- Shifnal	yes	yes	Not Specified	The proposed Development Boundary along Park Lane as shown on the Shifnal Inset Plan to incorporate existing built development on either side of the Lane is logical and appropriate and fully supported. The Development Boundary should remain as indicated regardless of whether proposed Safeguarded Land to the west of Shifnal, between Park Lane and Madeley Road is retained in the Plan.
A0087	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.25	Yes	No	No	<p>1.Cressage should remain open countryside is not designated a Hub to ensure no significant housing development will take place in Plan period which is assumed to be at least 20 years. This would reflect the view of the majority of residents.</p> <p>2.Draft Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing ( lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3.Full needs assessment required to understand what is needed for the village</p> <p>4.Parish Council has not challenged Hub status or accurately represented local view- this should be considered by the Inspector.</p> <p>5.Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given</p> <p>6.Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run . Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7.Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0086	B001	The Development Boundary at Park Lane Shifnal should remain as indicated, regardless whether or not the proposed Safeguarded Land to the west of Shifnal, between Park Lane and Madeley Road, is the subject of Modification.	The Local Plan has established the development boundary for Shifnal on the Policies Map and it is not proposed to amend this boundary any further and the land proposed to be released from the Green Belt at Lodge Hill between Park Lane and the A4169 will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038.	No
A0087	B001	Flawed Community Hub scoring system & irregularities and errors should be specifically considered by the Inspector; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised by the Inspector at examination. CPREs response & objections should be fully considered by the Inspector.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0088	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13. Much Wenlock Place Plan Area	No	No	No	<p>Objection to the soundness of Reg 19 Plan related to SC lack of intention &amp; failure to: consult lawfully and meaningfully; engage and collaborate with the community and refusal to work through local community structures. Consultation on the LPR has been inadequate, contrary to statutory guidance and legal requirements and Shropshire Council have failed to consider significant community feedback.</p> <p>Consider LPR process contradicts Government Localism policies undermining trust in the planning process. Response reflects extensive community engagement by Much Wenlock Neighbourhood Plan Refresh Group &amp; community feedback. Also reflects evidence regarding development in the town. This is supported by detailed documentation, including from submitted links, which details community consultation &amp; outcomes. ( NB Council system prevents access to Google drive links ).</p> <p>No alternative development approaches to Preferred site' presented have been discussed with the community and the LPR Reg19 has not put forward any assessment options. Beyond the on-line publication and invitation to comment on the LPR, no meaningful community engagement has been undertaken or attended by Shropshire Council other than meeting held January 2019. This did not provide a transparent method for resident feedback to preferred options. The Town Council (MWTC) have not engaged the community, have misrepresented community and supported proposals without community consultation (as detailed in rep). Extracts of minutes provided to illustrate MWTC lack of public consultation and approach, including decision not to update neighbourhood plan. Unclear and conflicting information presented to the community by Shropshire Council regarding development requirements and delivery. Unexplained change leading to community confusion as a result of policies &amp; decisions of both SC and MWTC. Undue reliance by Shropshire Council on MWTC meetings and feedback. SC have misled MWTC to believe local plan would override the MWNP and take precedence with the option of development implemented through review of the MWNP not offered.</p> <p>Decision on Preferred Site should be made through the proper planning process, i.e. a consideration of all options through a review of the MWNP which allows meaningful community consultation. Benefit of increasing community cohesion.</p> <p>Consultation results and analysis by Shropshire skewed by inclusion of Cressage responses regarding development.</p> <p>Shropshire Council has not complied with its own SCI, which is inadequate in reference to neighbourhood plan making bodies &amp; delivering meaningful community consultation. SC has ignored LPR Policies where it undertakes to 'build consensus around shared local priorities and proposals' LPR Reg 19, 2.22, p 9. The LPR process has demonstrated an absence of commitment to community engagement &amp; options exploration (including public meetings). Expectation that concerns will be considered at Examination rather than earlier through the review process. Weaknesses of consultation process further detailed in response.</p> <p>Previous substantive representations to Shropshire Council have been ignored &amp; not been responded to. Shropshire Council officers have not accepted invitations to public events held to discuss issues. Responses given by Cabinet July 2020 to public questions were inadequate and not responsive to public desire to delete preferred site and progress options through MWNP. Lack of recognition of weight that should be given to Neighbourhood Plan, highlighted by lack of reference in SCI and Cabinet paper on the LPR (January 2017-link provided) and focus on resolving issues at Examination. SC has not complied with Local Plan Regulation 22 which requires plan making authorities to transparently show that necessary, legally compliant consultation has been undertaken &amp; that responses have been appropriately considered and taken into account. Approach taken by Shropshire Council out of step with Planning for the Future White Paper which expects 'More engagement should take place at the Local Plan phase'.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0088	B001	<p>Shropshire Council should commit to meaningful, proper and lawful community engagement through a Neighbourhood Plan review with the community shaping a future for Much Wenlock which integrates solutions to flooding, infrastructure and development needs.</p> <p>Identifying within the Local Plan a deliverable programme of infrastructure and funding arrangements, agreed with the community, to meet the town's needs, also reflecting development in the Place Plan area and elsewhere which will impact, aligned with current policies on climate change and sustainability.</p>	<p>Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>With regard to infrastructure provision, it is important to note that the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements or identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for a site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0088	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13. Much Wenlock Place Plan Area	No	No	No	<p>Much Wenlock Strategy : Shropshire Council have failed to engage with NP refresh group, work constructively in the local area and consider the Much Wenlock Neighbourhood Plan, significant evidence &amp; national policy and guidance.</p> <p>Much Wenlock has no strategic contribution in Plan Review and MWNP as non-strategic Plan remains relevant and applicable. National Policy continues to highlight relevance &amp; importance of NPs. LPR fails soundness tests because it has not taken into account or recognised the sustainable, professionally drafted, comprehensive and effective policy approach in the Much Wenlock Neighbourhood Plan (MWNP) which expresses significant community contribution and intent as evidenced by the independent assessor's formal report &amp; referendum (2013). The MWNP sets out clear policies that reflect the community's desire to not have large scale development &amp; maintain the scale, style and setting of Much Wenlock .</p> <p>Agreed community policy approach of 'limited development to meet local needs' through development on small scale sites (as set out in the MWNP 2013-2026) has been overridden. This lack of compliance with Neighbourhood Plan is contrary to national planning policy and guidance. Community should not be overridden.</p> <p>Plan is not sound because :it has ignored the Neighbourhood Plan; has not suggested an appropriate strategy and has not considered reasonable alternatives; does not take into account the evidence that current policy approaches are effectively delivering housing , and can do so until 2036 even with the increase to the target (as detailed further in representation); It does not meet objectively assessed needs as described in the MWNP, Place Plan and supporting evidence; As well as promoting community cohesion, formal review of MWNP would identify better options better reflecting SCs climate change, economic sustainability and flood alleviation policies.</p> <p>Shropshire Council's Hierarchy of Settlements report (2017), which is a foundation of the LPR, fails to recognise MWNP as part of the Development Plan. Lack of recognition and reflection of MWNP &amp; its key policies, including those that accord with emerging local plan policy such as Climate Change &amp; sustainability and despite acknowledgement (in 2017) by Shropshire Council that MWNP that housing policies are appropriate and working. SC interprets the NP for Much Wenlock as only being relevant for influencing details of design but no assessment available of how the MWNP has been taken into account/ discounted and Councillors did not endorse any rationale or evidence that justified setting aside effective current MWNP local policy for the delivery of housing. Proposals for Much Wenlock are not strategic, and SC has not 'responded positively to a range of evidence as required or explained what change of circumstances apply to justify its approach.</p> <p>More inclusive approach to development and growth elsewhere Unexplained lack of consistency in approach as similar settlements, Broseley, Bishops Castle and Cleobury Mortimer are being allowed to decide on the location and scale of development in the neighbourhood plans they are bringing forward. Allowing review of the MWNP to identify suitable location(s) and the type of development would be appropriate for Much Wenlock and this option should have been given. Submitted appendix details Ministerial support for Neighbourhood Plans &amp; need/ role for community participation &amp; buy in to planning.</p> <p>Incorrect interpretation of National Policy SC has interpreted its role as defining a site rather than strategic policies, solutions and objectives or evaluating a range of options or integrating development with the town's strategically assessed infrastructure needs. SC has also not set out reasons for setting aside the key policies for Much Wenlock. MWNP is the correct tool to identify non-strategic issues such as the location and delivery of the limited new housing required to support the 5-year land supply and meet local needs.</p> <p>Improper &amp; unsubstantiated focus on delivery of extra 200 houses and a single large housing site- when alternative more sustainable planning approaches available which are based on a substantial evidence base. No evidence for the increase in housing target/site number from that proposed preferred options stage. Approach not consistent with national policy; proposals will not deliver sustainable development because of the lack of necessary infrastructure investment and ignoring alternative options which would contribute positively to both sustainability and climate change; ignoring flood risk and local and National Flood strategies. Much Wenlock has a unique and fragile character and characteristics and aspirations which needs to be specifically taken into account and reflected in a local vision. Plan review proposals driven by countywide completion targets and scope to achieve planning gain and reduce Council expenditure. There has been insufficient recognition of its characteristics, relative size and infrastructure and service limitations, in identification as a key centre and its strategic role. 5-year review by the LPA can legitimately identify housing needs and requirements of its whole area but not simply overturn community aspirations defined in NP without evidence. The site allocation is not of strategic importance or part of strategic approach as Much Wenlock, is suitable only for 'limited development to meet local needs.</p> <p>Proposals for Much Wenlock ignore delivery of additional housing within the Place Plan area at Ironbridge and other strategic implications of wider LPR Reg 19 proposals including cumulative impacts of development in Much Wenlock, Ironbridge &amp; Bridgnorth which will overwhelm the road infrastructure, in particular pinch point at the 'Gaskell Corner' in Much Wenlock. Lack of policies to help to mitigate the damage to well-being and infrastructure from development and prevent Much Wenlock becoming a dormitory car-dependent town for the Black Country.</p> <p>SC Preferred Scale and Distribution of Development ( 2017) housing guideline of 150 over the plan period reflected the housing growth being experienced , likely trajectory over the extended plan period and reasonably compared to MWNP Neighbourhood Plan 2013-2026 growth guideline of was 130 dwellings was supported locally but preferred' single site approach not. 120 dwelling proposal combined with other growth will far exceed Plan period target of 200 dwellings, which together with other Place Plan development, placing, huge pressure on Much Wenlock's fragile environment and infrastructure.</p> <p>No explanation of how the Draft Local Plan housing proposals will meet local housing needs or how scale of development arrived at and how it will maintain character &amp; setting. MWNP/SC evidence show a greater need for smaller homes to suit young buyers and downsizers, as well as single level dwellings for older residents. Failure to meet these needs potentially challenges social cohesion. No evidence that single large commercial site will meet these local needs. An approach which utilises smaller and brownfield sites to achieve this better meet community aspirations in the MWNP, the character of Much Wenlock as a historic market town &amp; the Government's direction for the future of planning to make planning more inclusive and create more beautiful places. Importance of retaining the distinctiveness of Much Wenlock recognised in existing Plans and policy ambitions in Reg 19 Plan but not in the approach to LPR in Much Wenlock. Reg 19 Local Plan proposal for Much Wenlock does not meet the Local Plan Policy tests set out in policies SP1, SP2, DP21 and others and so will not deliver on the Vision (2.31) e.g. community cohesion , enhancement of historic assets; sustainability etc.</p> <p>Infrastructure needs are set out in the Much Wenlock Place Plan including emerging problems with traffic and road safety, sewage capacity, flooding and health services provision and need for recreation facilities &amp; accessible green space. Investment required to address public transport &amp; traffic impacts, including through the Conservation Area . There is a water shortages issue. Poor public transport ensures car reliance for the foreseeable future, contrary to Climate Change policies and Climate emergency. No indication of delivery mechanisms or funding streams to address infrastructure needs identified in Place Plan. No considered planning for the Town and no strategy in identifying investment or enhancing historic assets. LPR omits to address these infrastructure needs in a comprehensive way. Concern that LPR Reg 19 relegates the Place Plans as not being a statutory part of the local plan with no weight in decision making . MWNP pertinent as it entitles 25% of the revenues from the Community Infrastructure Levy arising from the development to help deliver community vision. No positive or defined plans are being put forward for the necessary infrastructure improvements for the town except proposal in SC's Infrastructure Funding Statement (December 2020) for Hunters Gate flood risk management infrastructure which is welcome but contradictory to Policy S13's reliance on a commercial development. Proposed roundabout is only necessary to meet highways requirements resulting from the 120-house development , not identified as necessary in the Place Plan and there are other potential mechanisms for a traffic calming needed and other priorities for traffic management, particularly Gaskell Corner.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0088	B002	<ul style="list-style-type: none"> <li>•Identified site MUW012VAR should be deleted &amp; scale, location and type of additional housing development be addressed through MWNP review, in line with community aspiration, sustainable development and climate change policies.</li> <li>•To achieve balanced growth a delivery plan for employment land, subject to catchment wide flood risk assessment, should be identified.</li> <li>•Strategic flood risk assessment should be undertaken as a priority and underpin all future development policy and decisions. The Local Plan should commit to comprehensive, whole catchment flood risk assessment and development proposals should be considered in this context of clearly defined options for addressing the risks and securing long term resilience. Approach should conform to the NPPF and the Government’s National Flood Risk Strategy</li> <li>•Shropshire Council should commit to meaningful, proper and lawful community engagement through a Neighbourhood Plan review with the community shaping a future for Much Wenlock which integrates solutions to flooding, infrastructure and development needs</li> <li>•The Local Plan should identify and commit to a delivery plan for the employment site allocated in the Neighbourhood Plan &amp; release of the housing site(s) should be linked to the employment provision of employment to ensure balanced development</li> <li>•Much Wenlock should be deleted from being within a ‘strategic growth corridor’</li> <li>•Identifying within the Local Plan a deliverable programme of infrastructure and funding arrangements, agreed with the community, to meet the town’s needs, also reflecting development in the Place Plan area and elsewhere which will impact, aligned with current policies on climate change and sustainability.</li> </ul>	<p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>Shropshire Council also considers appropriate and effective consultation has been undertaken to inform the Local Plan Review and that all consultation responses have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 addresses infrastructure provision to support development.</p>	No

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A0088	B002 Cont'd						<p>No recognition of changes to context, including Ironbridge proposals &amp; national flood policy, or an identified deliverable programme of infrastructure investment to address the significant weaknesses in the town's infrastructure to make growth sustainable; Funding arrangements for any infrastructure development should be set out in advance to ensure public confidence and support. MWNPP refresh Group's 'Certainty and Delivery' paper sets out clear alternative options for the achievement of additional development and addressing infrastructure needs.</p> <p>The Reg 19 Plan review fails to : meet national policies; openly consider or evaluate alternative and better planning solutions and is based on flawed assessments, ignoring relevant evidence. Evidence : Insufficient/out of date evidence – required housing needs survey has not been carried out by Shropshire Council to understand local needs. Given lack of information unclear how right type of affordable housing to meet local needs can be delivered through market development options. Much Wenlock Refresh Group have however carried out a recent survey of housing need. Representation submits evidence which should be considered ( via links ) including : reports of local consultation undertaken ;community feedback; Certainty and Delivery Report; Much Wenlock –Options for Sustainable Development Annex 1; Much Wenlock Final Submission to the LPR; response to the Ironbridge Master Plan; Much Wenlock Neighbourhood Plan; Cabinet reports and minutes of various meetings as well as published national policy &amp; guidance.</p> <p>Much Wenlock /Site - Flooding and the Rapid Response Catchment – lack of a strategic, catchment-wide approach and failure to meet Shropshire Council POLICY DP21 &amp; national policy.</p> <p>Long history of flooding in/ around Much Wenlock related to its geological and hydrological context exacerbated by development resulting in serious consequences for the community 2007 &amp; 2020 (factors further detailed in response). Flood risk known liable to increase due to climate change. Potential for future flooding with serious consequences. A comprehensive solution to reduce risk to life and property from surface water flooding for the whole town is not considered by LPR.</p> <p>Much Wenlock Flood Action Group set up 2007 considered all sites subject to flooding. Town Council endorsed a resolution in January 2008 following Much Wenlock local referendum of no further development until flooding issues Much Wenlock resolved. Much Wenlock within a designated Rapid Response Catchment remains at risk of serious surface water flooding with risk to life and property. Various flood investigative reports (detailed in submission) provided analysis of the problem. Construction of attenuation measures following 2007 serious flood event, have resulted in flood impact reduction and mitigated but not wholly solved the problem, with continuing serious flood events across the town in 2020. Area around Hunters Gate &amp; MUW012VAR remain at flood risk. Shropshire Council has failed to progress proposals for flood alleviation affecting site MUW012VAR identified in 2011. Full understanding of the causes and potential solutions is lacking. Strong argument that all development should be directed away from the town altogether on the basis of the high risk of flooding.</p> <p>Lack of confidence and trust in SC in its role as a flood risk management authority due to lack of transparency and history of shortcomings in meeting legal and other obligations of national flood risk strategy as set out in more detail in representation para 5.14 -5.22 . SC approach does not follow national steer (backed by funding) in taking an inclusive approach with communities &amp; working with them or acknowledge role of NP. Evidence that alternative (non-housing led) solutions to flooding exist and are viable.</p> <p>A new comprehensive strategic flood risk assessment as required by national policy needs to be undertaken prior to considering any site allocations, rather than partial and limited proposals from a single landowner and commercial developer. Because of complex geo-physical local circumstances simple site related attenuation schemes are not appropriate. In combination with policy drivers in the National Flood Risk Strategy (July 2020), a more sophisticated, integrated approach requiring strategic flood risk assessment of the entire catchment backed up by an agreed and appropriately funded overall remediation, using nature based solutions &amp; supporting wider environmental benefits, is necessary. Options and innovative solutions should be identified and agreed for the whole catchment, to improve resilience to both floods and droughts prior to seeking funding from the new available substantial Government resources prior to consideration of further development. Longer term view needs to be taken in resolving the tension between flooding and further development &amp; building community trust. Community's strong opposition to development-led flood alleviation based on costly local experience. SC's only commitment to infrastructure investment, a scheme funded by EA and Severn Trent suggests that the rationale for a large 120 house site is no longer valid. The proposed 'solution' also ignores alternative options for natural flood management, proven effective elsewhere, now at the heart of Environment Agency and Government strategy. Proposals are premature in view of programmed EA National Flood Risk Assessment which will provide more accessible and trusted information for making good investment decisions and aid review of MWNP to support better planning solution. SC approach ignores steers – including Defra announcements. Increased funding availability alleviates need for developer-led solution favoured by SC because of funding constraints.</p> <p>Opportunity to demonstrate national good practice by integrating the flood risk with the MWNP missed. MW rapid response catchment is an important contributor to the wider flooding problem within the Severn Catchment. Significant flood risk for the whole catchment has been acknowledged by Shropshire Council but they have not addressed the relationship between this risk, the town, the MWNP policies and the need and location of development.</p> <p>Insufficient attention paid to delivery of sustainable development and impacts on the distinctive character of the town by a large site. Too great a focus on potential for fast delivery. 'Preferred site' presented but no alternative development approaches have been discussed with the community; no alternative strategies for Much Wenlock have been considered by the Council and no assessment options put forward. SC refusal without evidence to consider small site approach. Top down approach. SC site assessment process identified a number of potential housing sites that, allowing for continuing infill development, could accommodate appropriate numbers through smaller scale development in potentially better locations.</p> <p>LPR approach driven by 5-year land supply requirements rather than existing MWNP policy and available evidence. No evidence to suggest that the MWNP current policy approach or allocation of a small site(s) would be wrong or could not deliver required development.</p> <p>MWNP Refresh Group analysis of SC 2020 site assessment evidences achievability of specific sites for small scale development to meet need &amp; exposes factual and technical flaws and inconsistencies in the SC's evidence base (set out in response, including appendix 2 &amp; referenced 'Certainty and Deliverability report'). Consider site assessment is flawed by lacking appropriate consideration of positive outcomes for the town or limitations in terms of negative impact. SC insufficient acknowledgement of NPPF requirements for sites, local infrastructure constraints and traffic impacts. SC process has eliminated alternative viable options. Appendix 2 re-assesses sites &amp; considers &amp; details scope for appropriate, sustainable development on various combinations of alternative sites (detailed) including MUW001; MUW002; MUW008;( &amp; MUW011C for employment) . Submit that these 3 identified residential sites offer a better, more flexible opportunity than preferred MUW012VAR &amp; advantages of these sites are detailed, including less negative impacts &amp; how specific local housing needs could be met.. Partial site development is also possible in respect of MUW08. Final option is one of no allocation since housing completion target being already met &amp; exceeding it increases catastrophic flood risk threat. There are large numbers of market-led homes being built and planned nearby, with likely continued small site development in and around the town which will deliver a contribution. To be acceptable development must help deliver community needs and vision.</p> <p>Reg 19 proposal does not reflect broader policy support for the appropriate reuse of land as suitable brownfield sites not brought forward. Better alternative greenfield sites also available. All identified alternative sites are more sustainably located and accord with current and proposed planning policy MWNP &amp; Local Plan.</p> <p>Evidence that market and affordable housing has been and will continue to be delivered to achieve housing agreed targets set by SC for 2036 or 2038. If SC stated current annual rates of development (of 18 per year) are continued Much Wenlock would experience substantial over-development. Overdevelopment will turn it into a commuter town. MWNP Refresh Group has alternative and sustainable options to deliver small -scale sites that would meet the residential mix policy and SC target of 165-200 dwellings until 2038. Alternatives could be considered through Review of NP.</p> <p>Appendix 2 of response details 'Options for Sustainable Development' considering housing delivery against targets; questions appropriateness of housing target/windfall allowances specifically compared to Church Stretton &amp; Cleobury Mortimer.</p> <p>Balanced Growth not achieved or deliverable : Delivery of employment to achieve 'balanced growth' is not assured. Land at Stretton Road, allocated in the former Bridgnorth Local Plan ( 20 years ago) &amp; the MWNP has not been brought forward. To bring the site forward &amp; achieve 'balanced growth' proposals to service then market the site are required and no known publicly available proposal to do so although the MW Place Plan identifies the employment site within Priority A. Proposals for a strategic corridor running through Much Wenlock supports dormitory growth dependent on private car transport &amp; contradict policies for balanced growth. Development proposals do not address the climate emergency.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0088	B002 Cont'd			



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0088	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13. Much Wenlock Place Plan Area	No	No	No	<p>Much Wenlock Flood Action Group set up 2007 considered all sites subject to flooding, including MUW012VAR. Town Council endorsed a resolution in January 2008 following Much Wenlock local referendum of no further development until flooding issues Much Wenlock resolved. Much Wenlock within a designated Rapid Response Catchment remains at risk of serious surface water flooding with risk to life and property. Various flood investigative reports (detailed in submission) provided analysis of the problem. Construction of attenuation measures following 2007 serious flood event, have resulted in flood impact reduction and mitigated but not wholly solved the problem, with continuing serious flood events across the town in 2020. Area around Hunters Gate &amp; MUW012VAR remain at flood risk. Shropshire Council has failed to progress proposals for flood alleviation affecting site MUW012VAR identified in 2011. Full understanding of the causes and potential solutions is lacking. Objection sets out detail of flooding factors and events at Hunters Gate &amp; site MUW012VAR including major flood incidents and issues with and failure of SUDs installation at Hunters Gate development.</p> <p>Sequential test in respect of flood risk not met. Alternative sites at less at risk are available. Proposed allocation does not reflect SAMDev Inspector's report and are contrary to the: NPPF guidance on flood risk and preparations for climate change. Local and National Flood Risk Management strategies emphasise working with communities to develop resilience to risks. Conflicts with Policy DP21 which states that 'The safeguarding of people and property and mitigation of the effects of climate change in accordance with Policy SP3 will be achieved by directing development to areas at least risk of flooding'. Proposed approach directs substantial development to a flood-prone catchment and most flood-prone site in catchment. Annex 1 of response identifies that alternative sites which have already mitigated the effects of flooding through the installation of attenuation ponds are available. Strong argument that all development should be directed away from the town altogether on the basis of the high risk of flooding.</p> <p>Lack of confidence and trust in SC in its role as a flood risk management authority due to lack of transparency and history of shortcomings in meeting legal and other obligations of national flood risk strategy as set out in more detail in representation para 5.14 -5.22. SC approach does not follow national steer (backed by funding) in taking an inclusive approach with communities &amp; working with them or acknowledge role of NP. Evidence that alternative (non-housing led) solutions to flooding exist and are viable.</p> <p>Site should be deleted. choice of MUW012VAR is based on a flawed site assessment process that contains inaccurate information. Strong local opposition &amp; doesn't comply with the policies of Neighbourhood Plan. The allocation would not meet the type or scale of local needs. Doesn't comply with requirements of SC's DP1 (Residential Mix), DP17 (Landscape and Visual Amenity) and SP1 (The Shropshire Test). There are alternative options that will deliver 'more sustainable' development and meet policy tests. Development at a scale incompatible with the nature of the historic settlement ( largest in its history) and in an isolated position outside development boundary, contrary to NPPF. MW012VAR does not satisfy highways and transport requirements identified in the NPPF. There are better sites available, including MUW008. MUW012VAR flawed from an accessibility perspective with site MUW008 closer to the town centre, less isolated and with far better pedestrian and public transport accessibility (as detailed in response paras 19.1 ;20.1 The 'preferred' site with introduced roundabout access will create delays, noise and street lighting intrusion and badly impact both congestion and air quality at the critical Gaskell Corner junction with existing demand pressure significantly increased by more vehicular movement including HGVs from pre development mineral extraction at the former Ironbridge Power Station site. Increased traffic impacts detailed, particularly on A4169 Smithfield Road /Gaskell Corner junction which operates close to capacity as evidenced, by Ironbridge Power Station Transport Assessment (TAA) which recommends improvements to the junction. TAA acknowledges that the issue at the Gaskell Corner is related to high traffic volumes, the specific layout and design of the junction and movements through it. TAA confirms that options identified will not resolve the problems at the Gaskell Corner. Representation quantifies and details increased demand from MUW012VAR and likely outcome that vehicular movement to and from the site will use route through the town to avoid delays at the junction. MW012VAR, with delay-inducing roundabout access, with negative impact at the Gaskell Corner and increased rat-running &amp; is poor technical and planning practice. No identified need for this roundabout &amp; if a need is identified other gateway/traffic calming schemes e.g. speed limit extension/ signage/road narrowing/landscaping would be effective. TAA does not quantify the impact of the additional delays on Air Quality. Impacts and delays at this junction however have been seriously underestimated in the TAA because future impact from the proposed residential developments at Cressage (80 homes) and Tasley, Bridgnorth (1000-1500 homes) not included. Additionally, inappropriate modelling method used for this situation. TAA is flawed and improvement options untested and unlikely to be able to address issues identified (detailed in 18.5 -18.16). The allocation of MUW012VAR contrary to sequential preference given to brownfield sites (which are available in Much Wenlock ), specifically identified in relation to strategic corridors.</p>

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A0088	B003	<ul style="list-style-type: none"> <li>•Identified site MUW012VAR should be deleted &amp; scale, location and type of additional housing development be addressed through MWNP review, in line with community aspiration, sustainable development and climate change policies.</li> <li>•To achieve balanced growth a delivery plan for employment land, subject to catchment wide flood risk assessment, should be identified.</li> <li>•Strategic flood risk assessment should be undertaken as a priority and underpin all future development policy and decisions. The Local Plan should commit to comprehensive, whole catchment flood risk assessment and development proposals should be considered in this context of clearly defined options for addressing the risks and securing long term resilience. Approach should conform to the NPPF and the Government’s National Flood Risk Strategy</li> <li>•Shropshire Council should commit to meaningful, proper and lawful community engagement through a Neighbourhood Plan review with the community shaping a future for Much Wenlock which integrates solutions to flooding, infrastructure and development needs</li> <li>•The Local Plan should identify and commit to a delivery plan for the employment site allocated in the Neighbourhood Plan &amp; release of the housing site(s) should be linked to the employment provision of employment to ensure balanced development</li> <li>•Much Wenlock should be deleted from being within a ‘strategic growth corridor’</li> <li>•Identifying within the Local Plan a deliverable programme of infrastructure and funding arrangements, agreed with the community, to meet the town’s needs, also reflecting development in the Place Plan area and elsewhere which will impact, aligned with current policies on climate change and sustainability.</li> </ul>	<p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>Shropshire Council also considers appropriate and effective consultation has been undertaken to inform the Local Plan Review and that all consultation responses have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 addresses infrastructure provision to support development.</p>	No

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A0088	B003 Cont'd						<p>The allocation of MUW012VAR contrary to NPPF and good practice which requires that development sites should prioritise pedestrian and cycle movements, facilitate access to good public transport and whose impact on the highway network and safety can be mitigated. Significant impacts from the site on transport network and safety cannot be cost effectively mitigated. Increased traffic from unsustainable development will damage the social and physical fabric, restrain economic potential, damage to the town's character, historic fabric and result in loss of the visual quality of its unique rural setting adjacent to an AONB and significantly harm the environmental setting of the Town. Identification of site contrary to SC policies ( including SP2), ignores need for proximity to shops, community facilities &amp; open space and reduction in car use. Site assessment is flawed and highlights that there are alternative more sustainable options against the Plan's policies SP1 &amp; SP3. Also, negative impacts on flooding; access to services &amp; facilities, high street vitality highlighted when considered against other MWNP, Open Space, Sport &amp; Recreation Interim Planning Guidance and SAMDev policies. Due to lack of consultation Shropshire Council have failed to consider relevant local evidence which combined with inability to effectively compare sites misses the opportunity to achieve a more integrated and sustainable community with easier access to facilities including smaller single level development sites near the town centre. MUW01 and 02 are more sustainable brownfield sites within Much Wenlock development boundary.</p> <p>Objection sets out detail of flooding factors and events at Hunters Gate &amp; site MUW012VAR including major flood incidents and issues with and failure of SUDs installation at Hunters Gate development. Sequential test in respect of flood risk not met. Alternative sites at less at risk are available. Proposed allocation does not reflect SAMDev Inspector's report and are contrary to the: NPPF guidance on flood risk and preparations for climate change. Local and National Flood Risk Management strategies emphasise working with communities to develop resilience to risks. Conflicts with Policy DP21 which states that 'The safeguarding of people and property and mitigation of the effects of climate change in accordance with Policy SP3 will be achieved by directing development to areas at least risk of flooding'. Proposed approach directs substantial development to a flood-prone catchment and most flood-prone site in catchment. Annex 1 of response identifies that alternative sites which have already mitigated the effects of flooding through the installation of attenuation ponds are available. SC approach at odds with both the national strategy for flood risk management and increasing resilience and its own Shropshire Local Flood Management Strategy. Objection sets out detail of flooding factors and events at Hunters Gate &amp; site MUW012VAR including major flood incidents and issues with and failure of SUDs installation at Hunters Gate development. Flooding events detailed in representation, including 2020 ponding across a substantial part of site MUW012 fed by groundwater springs with groundwater flooding to Hunters Gate. The site (in 2015) was identified by the Environment Agency, on data provided by Shropshire Council, as one of the areas of the catchment of Much Wenlock most at risk of flooding. Earlier 2011 Mouchel report, whilst recommending attenuation ponds to the south of the town, above site MUW012 noted that "...flooding mechanisms are still not completely understood" and recommended further investigation . Given this complexity no confidence in the delivery of an effective developer-led flood alleviation scheme. MUW012VAR expected to deliver solutions to a historic flood problems and failures but this cannot lawfully be imposed or guaranteed. Solutions should be identified, agreed and funded separately in advance of the consideration of further development. Further investigatory report commissioned by Severn Trent identified several causes of the flooding on Hunters Gate including excessive runoff from site MUW012VAR (as well as excessive flow from the drainage of the A458) causing an overload of the drainage system. Knock on impacts of flooding from Hunters Gate were also identified, including undue pressure on the town systems &amp; the flow out of the bowl &amp; to the River Severn. On this basis sequential test has not been applied by SC in preparing their plan. In particular, no evidence that a single developer will guarantee 'no risk' to the homes downstream of Much Wenlock and into the catchment area of the River Severn. Unclear what happened as a result of Severn Trent/SC bid for funding for a scheme to reduce flood risk from site MUW012. Allocation fails to reflect investigative report outcomes none of which suggested that additional development could ameliorate rather than increase flood problem. Lack of transparency about flooding alleviation proposals. No pre consultation opportunity for public scrutiny of development related flood alleviation scheme justifying proposed increased housing numbers to defray costs.</p> <p>SC has not taken into account findings from previous local plan inquiries &amp; the Inspector's report into the Bridgnorth Local Plan in 2006 concluding that a large housing development on a part of the same site as suggested by the LPR (MUW 0012) would have a significant impact on town's economy through a negative effect on the town's tourism trade. Insufficient attention paid to impacts on the character of the town by a large site. Proposal ignores the special nature of the town. Allocation of enlarged site completely contrary to strength of residents feeling. Rationale for doubling of site size between Reg 18 &amp; 19 Plan versions, with a new site assessment which approval of an even larger development of 200/228 dwellings, not justified, clearly explained or appropriately consulted on. Increased development justified by recalculated costs of flood attenuation but inaccuracies and question the quality of the hydrological survey submitted by agents to support the site allocation. Stated commercial viability issue is not a sufficient consideration.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0088	B003 Cont'd			

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0088	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13. Much Wenlock Place Plan Area	No	No	No	<p>Place Plan Impacts: need for large site in Much Wenlock should be seen in context of Place Plan area. Impact of redevelopment of power station is extremely important in determining the role of Much Wenlock . Given, Place Plan geographies represent areas with functional relationships, the housing numbers/5 year supply required of the Much Wenlock Place Plan area have been addressed at the Power Station site and/or the infrastructure levy from those 1000 houses should deliver significant improvements for Much Wenlock.</p> <p>Redevelopment of the Ironbridge Power Station reduces the need for MW to provide additional housing. Do not agree that Ironbridge strategic site is only providing buffer. Calculation of 5 year land supply means supply will be integral; the Place Plan provides the structure for planning and infrastructure provision and there must be consideration of impacts on Much Wenlock infrastructure. LPR is dealing with the plan making process as a purely site allocation activity and is not being strategic as demanded by national policy and its reliance on Place Plans as local infrastructure strategies. Demand for a 5YHLS is important but not the determining factor for policy approach NB climate change ; sustainability; distinctive character of Much Wenlock etc.</p> <p>No acknowledgement that infrastructure in Much Wenlock also serves needs of Cressage and Buildwas, therefore development here will impact &amp; high risk of significant overdevelopment in the town &amp; Place Plan area.</p> <p>Scale of development at Ironbridge Power Station site significantly detrimental to Much Wenlock due to increased traffic flows along unsuitable roads &amp; within the Conservation Area. SC has not put forward mechanisms for addressing traffic and highways issues.</p>
A0088	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13. Much Wenlock Place Plan Area	No	No	No	<p>Redevelopment of power station is extremely important in determining the role of Much Wenlock in accommodating further housing and understanding the impact of growth in the area. Scale of development at Ironbridge Power Station site significantly detrimental to Much Wenlock due to increased traffic flows along unsuitable roads &amp; within the Conservation Area. SC has not put forward mechanisms for addressing traffic and highways issues. Redevelopment on and around the site of the former Ironbridge Power Station includes plans to build 1000 new homes in the narrowing strip of agricultural land still separating Much Wenlock from Telford. Do not agree that Ironbridge strategic site is only providing additional housing to buffer supply &amp; irrelevant to allocations for Much Wenlock town. No acknowledgement that infrastructure in Much Wenlock also serves needs of Cressage and Buildwas, therefore development here will impact &amp; high risk of significant overdevelopment in the town &amp; Place Plan area</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0088	B004	<ul style="list-style-type: none"> <li>Identified site MUW012VAR should be deleted &amp; scale, location and type of additional housing development be addressed through MWNP review, in line with community aspiration, sustainable development and climate change policies.</li> <li>To achieve balanced growth a delivery plan for employment land, subject to catchment wide flood risk assessment, should be identified.</li> <li>Strategic flood risk assessment should be undertaken as a priority and underpin all future development policy and decisions. The Local Plan should commit to comprehensive, whole catchment flood risk assessment and development proposals should be considered in this context of clearly defined options for addressing the risks and securing long term resilience. Approach should conform to the NPPF and the Government's National Flood Risk Strategy</li> <li>Shropshire Council should commit to meaningful, proper and lawful community engagement through a Neighbourhood Plan review with the community shaping a future for Much Wenlock which integrates solutions to flooding, infrastructure and development needs</li> <li>The Local Plan should identify and commit to a delivery plan for the employment site allocated in the Neighbourhood Plan &amp; release of the housing site(s) should be linked to the employment provision of employment to ensure balanced development</li> <li>Much Wenlock should be deleted from being within a 'strategic growth corridor'</li> <li>Identifying within the Local Plan a deliverable programme of infrastructure and funding arrangements, agreed with the community, to meet the town's needs, also reflecting development in the Place Plan area and elsewhere which will impact, aligned with current policies on climate change and sustainability.</li> </ul>	<p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>Shropshire Council also considers appropriate and effective consultation has been undertaken to inform the Local Plan Review and that all consultation responses have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 addresses infrastructure provision to support development.</p>	No
A0088	B005	<ul style="list-style-type: none"> <li>Identified site MUW012VAR should be deleted &amp; scale, location and type of additional housing development be addressed through MWNP review, in line with community aspiration, sustainable development and climate change policies.</li> <li>To achieve balanced growth a delivery plan for employment land, subject to catchment wide flood risk assessment, should be identified.</li> <li>Strategic flood risk assessment should be undertaken as a priority and underpin all future development policy and decisions. The Local Plan should commit to comprehensive, whole catchment flood risk assessment and development proposals should be considered in this context of clearly defined options for addressing the risks and securing long term resilience. Approach should conform to the NPPF and the Government's National Flood Risk Strategy</li> <li>Shropshire Council should commit to meaningful, proper and lawful community engagement through a Neighbourhood Plan review with the community shaping a future for Much Wenlock which integrates solutions to flooding, infrastructure and development needs</li> <li>The Local Plan should identify and commit to a delivery plan for the employment site allocated in the Neighbourhood Plan &amp; release of the housing site(s) should be linked to the employment provision of employment to ensure balanced development</li> <li>Much Wenlock should be deleted from being within a 'strategic growth corridor'</li> <li>Identifying within the Local Plan a deliverable programme of infrastructure and funding arrangements, agreed with the community, to meet the town's needs, also reflecting development in the Place Plan area and elsewhere which will impact, aligned with current policies on climate change and sustainability.</li> </ul>	<p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>Shropshire Council also considers appropriate and effective consultation has been undertaken to inform the Local Plan Review and that all consultation responses have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 addresses infrastructure provision to support development.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0088	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13. Much Wenlock Place Plan Area	No	No	No	Lack of rationale for and locational definition (plan) of Eastern Belt M54/A45, A41/A464 and A4169/A458/A454 strategic corridor appears to be a collection of all A roads within Shropshire . Inclusion of Much Wenlock in a 'strategic growth corridor' is not explained or underpinned with evidence. Inappropriate to include Much Wenlock at junction of A4169 and A458 – already under significant pressure from movement & unsuitable to accommodate the potential development pressures that will come with being identified as within a 'Strategic Corridor'. Conflicts with need to encourage employment growth, 'soft' tourism, and sustainable development as identified in the MWNP, NPPF and LPR Reg. 19. Proposals for a strategic corridor running through Much Wenlock supports dormitory growth dependent on private car transport & contradict policies for balanced growth
A0088	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13. Much Wenlock Place Plan Area	No	No	No	Traffic congestion and air quality impacts on the town's Conservation Area will be further exacerbated by the Plan proposal (3.142. p64) which designates, the 'strategic corridors' including 'Eastern Belt A4169/A458/A454. The proposal to accommodate housing and employment land for the Black Country under 'duty to co-operate' carries great risk that Much Wenlock on the east side of the county will become a commuter settlement for the Black Country/Telford. Lack of policies providing mitigation to help to offset the damage to well-being and infrastructure and prevent Much Wenlock becoming a dormitory car-dependent town for the Black Country. Likely impacts provide a strong argument for deleting the proposal for 1500 houses for the Black Country under the 'duty to co-operate'

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0088	B006	<ul style="list-style-type: none"> <li>•Much Wenlock should be deleted from being within a 'strategic growth corridor'</li> </ul>	<p>The A458 between Shrewsbury and Bridgnorth and leading on to connect with the Black Country is undoubtedly a strategic corridor through Shropshire as part of the principal road network. The town of Much Wenlock would also appear to support this designation lying on the junction of the A458 with the A4169 linking to Ironbridge and the redevelopment of the site of the former power station, and with Telford, Shifnal on to the M54 corridor principally through Junction 4. Nevertheless, SP14 does require consideration of the sequential preference for development in criterion 3 and the need to consider the sustainability of development proposals and their proposed location in criterion 4. It is considered that the matters raised in relation to the suitability of Much Wenlock to perform as a location for development on the A458 strategic corridor are addressed in SP14 which is considered to be consistent, sufficiently flexible and positively contribute to the achievement of the Local Plan strategy.</p>	No
A0088	B007	<ul style="list-style-type: none"> <li>•Identified site MUW012VAR should be deleted &amp; scale, location and type of additional housing development be addressed through MWNP review, in line with community aspiration, sustainable development and climate change policies.</li> <li>•To achieve balanced growth a delivery plan for employment land, subject to catchment wide flood risk assessment, should be identified.</li> <li>•Strategic flood risk assessment should be undertaken as a priority and underpin all future development policy and decisions. The Local Plan should commit to comprehensive, whole catchment flood risk assessment and development proposals should be considered in this context of clearly defined options for addressing the risks and securing long term resilience. Approach should conform to the NPPF and the Government's National Flood Risk Strategy</li> <li>•Shropshire Council should commit to meaningful, proper and lawful community engagement through a Neighbourhood Plan review with the community shaping a future for Much Wenlock which integrates solutions to flooding, infrastructure and development needs</li> <li>•The Local Plan should identify and commit to a delivery plan for the employment site allocated in the Neighbourhood Plan &amp; release of the housing site(s) should be linked to the employment provision of employment to ensure balanced development</li> <li>•Much Wenlock should be deleted from being within a 'strategic growth corridor'</li> <li>•Identifying within the Local Plan a deliverable programme of infrastructure and funding arrangements, agreed with the community, to meet the town's needs, also reflecting development in the Place Plan area and elsewhere which will impact, aligned with current policies on climate change and sustainability.</li> </ul>	<p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>Shropshire Council also considers appropriate and effective consultation has been undertaken to inform the Local Plan Review and that all consultation responses have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 addresses infrastructure provision to support development.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0088	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13. Much Wenlock Place Plan Area	No	No	No	No acknowledgement that infrastructure in Much Wenlock also serves needs of Cressage and Buildwas, therefore development here will impact & high risk of significant overdevelopment in the town & Place Plan area.
A0089	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S20 Ironbridge Power Station	Yes	Yes	Yes	<p>Landowner / developer of this site fully support the emerging allocation at Policy S20. &amp; have worked collaboratively with Shropshire Council &amp; Telford and Wrekin Council to develop the proposals for site redevelopment alongside the Local Plan process.</p> <p>Outline planning applications have been submitted to Shropshire Council &amp; Telford and Wrekin Council in December 2019 for up to 1,000 dwellings, a retirement village, employment land, retail, allotments, sports pitches, a railway, leisure uses, nursery/primary school, a park and ride facility, walking and cycling routes, and associated landscaping, drainage and infrastructure works. The development proposals reflect the requirements of Policy S20, the emerging policy, completed technical work and have been informed by extensive preapplication and continuing discussions with local authorities' officers and stakeholders.</p> <p>The landowner/agent has been actively engaged with Shropshire Council in the local plan preparation process. Representations were made at Regulation 18 consultation stages. Extensive public consultation has been undertaken prior to submission of the planning applications, including a stakeholder workshop and two public exhibitions. These exercises sought local community input in developing the site masterplan. As a result of this collaborative approach, the development proposals have been developed to comply with the Policy S20 site specific requirements .</p> <p>The mix of uses ensures that a comprehensive, appropriate, and sustainable development can be delivered . Whilst detailed design and layout to follow later in reserved matters applications, the submitted illustrative Masterplan demonstrates how the site can be developed to deliver a high quality and attractive mixed use development.</p> <p>Revised planning application documents have been submitted (June &amp; December 2020), with additional technical work and amendments to the Illustrative Masterplans, following requests from Shropshire Council for further information, initially under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Shropshire Council is currently undertaking further consultation on revised proposals but it is anticipated that the planning application will be formally considered in March 2021. NPPF seeks strategies which optimise use of previously-developed land that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, supporting opportunities for remediation. The redevelopment of Ironbridge Power Station will contribute towards achieving the aspirations of the Economic Growth Strategy (2017 – 2021), which identified the opportunity to capitalise on the strategic opportunity at this site, and will contribute towards meeting housing and employment need in Shropshire through the effective re-use of this partly brownfield site.</p> <p>The proposed allocation at Policy S20 represents a deliverable and sustainable opportunity that can be developed within the plan period. The site makes an important contribution to the Council's development strategy and supports the regeneration and remediation of a partly brownfield site to ensure a deliverable supply of housing and employment land in accordance with the requirements of the NPPF. The proposed allocation is sound, and the Illustrative Masterplan (Appendix 1) and planning application as submitted, demonstrate that the site can be developed to deliver a high quality sustainable development, fully in accordance with Policy S20.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0088	B008	<ul style="list-style-type: none"> <li>•Identified site MUW012VAR should be deleted &amp; scale, location and type of additional housing development be addressed through MWNP review, in line with community aspiration, sustainable development and climate change policies.</li> <li>•To achieve balanced growth a delivery plan for employment land, subject to catchment wide flood risk assessment, should be identified.</li> <li>•Strategic flood risk assessment should be undertaken as a priority and underpin all future development policy and decisions. The Local Plan should commit to comprehensive, whole catchment flood risk assessment and development proposals should be considered in this context of clearly defined options for addressing the risks and securing long term resilience. Approach should conform to the NPPF and the Government’s National Flood Risk Strategy</li> <li>•Shropshire Council should commit to meaningful, proper and lawful community engagement through a Neighbourhood Plan review with the community shaping a future for Much Wenlock which integrates solutions to flooding, infrastructure and development needs</li> <li>•The Local Plan should identify and commit to a delivery plan for the employment site allocated in the Neighbourhood Plan &amp; release of the housing site(s) should be linked to the employment provision of employment to ensure balanced development</li> <li>•Much Wenlock should be deleted from being within a ‘strategic growth corridor’</li> <li>•Identifying within the Local Plan a deliverable programme of infrastructure and funding arrangements, agreed with the community, to meet the town’s needs, also reflecting development in the Place Plan area and elsewhere which will impact, aligned with current policies on climate change and sustainability.</li> </ul>	<p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>Shropshire Council also considers appropriate and effective consultation has been undertaken to inform the Local Plan Review and that all consultation responses have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 addresses infrastructure provision to support development.</p>	No
A0089	B001	n/a	No soundness issues are raised by the respondent.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0090	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	No	Yes	<p>Proposals to located some 27% of development within rural settlements is: not justified as an appropriate strategy (lower carbon emission strategies exist), not sustainable, not consistent with national policy (which requires a move towards a low carbon economy), not consistent with other draft Policies (in so far as they purport to respond to the climate emergency), inconsistent with the zero-carbon spatial vision, inconsistent with the Climate Emergency declared by Shropshire Council and the UK parliament, inconsistent with the Zero Carbon Shropshire Plan and inconsistent with the 6th Carbon Budget (required by the Climate Change Act).</p> <p>Objection demonstrates, contrary to the National Planning Policy Framework (NPPF), rural development:</p> <ul style="list-style-type: none"> <li>-Will lead to up to 9 times more travel (for things like shopping, commuting, business, personal business and socialising) than development located in a key centre (so does not reduce the need to travel);</li> <li>-Cannot be realistically served by public transport (most minor Hubs and Clusters are served by only a single bus route with a singly bus in each direction in peak hours);</li> <li>-Cannot favour active means of travel (majority of cycling trips are short distances with 80% less than 5 miles and 40% less than 2 miles and walking as a means of communication is unrealistic and for leisure could occur equally in urban areas) ; and</li> <li>-Will lead to excessive amounts of embodied carbon in the automobile fleet (car ownership is much higher in rural areas and (1.78 per household compared with 1.23 in urban areas) and there is significant carbon embedded in cars); and</li> <li>-Isolate or increase dependence on others of those without cars.</li> <li>-Increase the need for travel or deny access to facilities (particularly social facilities), which is a particular issue for the young.</li> <li>-Increase the cost of travel - this is a particular concern for affordable housing.</li> </ul> <p>Consider the aspirations of the rural development policies are not supported by any clear evidence.</p> <p>Consider the Sustainability Appraisal (SA) is very poor quality (it does not compare carbon emissions between sites, assesses against specified measures rather than comparing sustainability with alternative sites, and fails to recognise societal conditions regarding access to private vehicles and efficiency of public transport) and cannot be taken to support this strategy.</p> <p>Consider development in Community Hubs and Clusters has not been evidenced as sustainable - no evidence development has in the past or would in the future significantly support services. Any benefit of this type needs to be competed with achieving a low carbon future.</p> <p>Object to proposals for the settlements of Kinnerley, Knockin, Llanymynech, Pant, Ruyton XI Towns, Trefonen, West Felton, Weston Rhyn and Whittington. Also object to proposals for all Community Clusters in the Oswestry Place Plan Area.</p> <p>An alternative strategy for the Oswestry Place Plan would involve the formation of a new modern settlement with good public transport links on the A5 strategic corridor, which would tie the area together and is fully consistent with the NPPF. See the Oswestry 2050 Plan - presentation attached to this representation. Consider this approach equally applies to the rest of Shropshire.</p>
A0090	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.1 Oswestry Place Plan Area	Yes	No	Yes	<p>Reference to Oswestry 2050 to justify the proposed development at Park Hall is a distortion of the facts. Park Hall was provided as an example of village settlements within an enlarged Oswestry, but this was a part of a wider example of what could be the result of a strategic planning exercise. Oswestry 2050 could be viewed as a pleas for a land use and transport plan for the A5 corridor.</p> <p>The Strategic Approach for the county and the Oswestry Place Plan Area is wrong.</p>
A0090	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Oswestry Hubs	Yes	No	Yes	<p>Object to the preferred sites in Kinnerley, Knockin, Llanymynech, Pant, Ruyton XI Towns, Trefonen, West Felton, Weston Rhyn and Whittington. Most of the hubs only have a rudimentary bus services, and schools and employment are far from the settlement. Avoidable GHG emissions will be created if development is in these locations. Development should be limited to local need in all of the following locations:</p> <p>II. Kinnerley –there is no evidence that the services are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>Knockin has no primary school or other facilities. There is no evidence that any support which further development might bring might be effective in maintaining the village hall. The settlement is not sustainable.</p> <p>Whilst Llanymynech has shops, access to a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>Whilst Pant has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>Whilst Ruyton has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable. The site allocated is a brownfield site, but it is distant from main services.</p> <p>Whilst Trefonen has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>Whilst West Felton has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>Whilst Weston Rhyn has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>Whilst Whittington has a shop, a primary school and other facilities, there is no evidence that these are in need of support which further development might bring, or that they provide a complete service which might make the settlement sustainable.</p> <p>Similar principles should be applied to development in Community Clusters as to open countryside. It is unlikely that any development in the listed Community Clusters would be sustainably located in relation to the policy to move to a low carbon economy. There is no convincing evidence that any of the small scale development envisaged in cluster settlements would make any significant difference to the viability of such settlements.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0090	B001	<p>1. Development in rural areas should be limited to that necessary to meet the needs of the rural areas.</p> <p>2. A development pattern should be developed which is compatible with the need to “move positively towards a zero carbon economy” as set out in the Plan’s Spatial vision. For Oswestry/A5 corridor this should start with the principles sets out in the Civic Society’s “Oswestry 2050” of a low carbon, public transport and active travel based settlement.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The pattern of development proposed seeks to direct the majority of development towards urban areas, but recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, this growth in urban areas will be complemented by appropriate new development within Community Hubs which are considered significant rural service centres; and to a lesser extent Community Clusters, which consist of settlements with aspirations to maintain or enhance their sustainability. Community Hubs have been identified through a Hierarchy of Settlements Assessment, a proportionate and robust assessment which considers such factors as the availability of a range of services and facilities, public transport, significant employment and high speed broadband. However, recognising the diverse nature of Community Hub settlements the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0090	B002	<p>The deletion of identification of Hub and Cluster Settlements within Policy S14, as set out in the attached document, consistent with the amendments sought to Policy SP2</p>	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to those Community Hubs proposed in the Oswestry Place Plan Area. However, recognising the diverse nature of Community Hub settlements the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0090	B003	<p>There should be no housing allocations in Kinnerley, Knockin, Llanymynech, Pant, Ruyton XI Towns, Trefonen, West Felton, Weston Rhyn and Whittington.</p>	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to those Community Hubs proposed in the Oswestry Place Plan Area. However, recognising the diverse nature of Community Hub settlements the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0090	B004	Sustainability Appraisal	Sustainability Appraisal and SP2	Yes	No	Yes	Consider the Sustainability Appraisal (SA) is very poor quality (it does not compare carbon emissions between sites, assesses against specified measures rather than comparing sustainability with alternative sites, and fails to recognise societal conditions regarding access to private vehicles and efficiency of public transport) and cannot be taken to support the strategy proposed in draft Policy SP2. Development in Community Hubs and Clusters is unsustainable.
A0090	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Yes	No	Yes	Consider the West Midlands Design Charter referenced in para 2 of draft Policy SP5 falls well short of the scope of Government guidance contained in the publications "Government Design Principles", "Design: process and tools" and to the extent that it is policy the report "Living with Beauty – Promoting Health Well Being and Sustainable Growth". Principle 10 is severely deficient and at odds with Government guidance on Effective Community Engagement in design. As such it is unsound. Consider Shropshire Council have failed to ensure effective community engagement and participated in decisions on Planning Applications.
A0091	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0091	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	Only very limited community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place. It should be noted that the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.
A0091	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '.. will make provision for the needs of the town and surrounding hinterland...'? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0090	B004	See summary of main issues.	The Council considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.	No
A0090	B005	The policy should be amended as follows: "in accordance with Government guidance on Design, National Planning Policy and, where compatible with national guidance, the West Midlands Design Charter. Collaborative engagement will be a watchword of public participation in design." The explanation should be amended to suit, emphasising the need to meet guidance on effective community participation in design.	Noted. Shropshire Council have endorsed the West Midlands Combined Authority (WMCA) Design Charter and acknowledged that this can be taken into account as a material consideration to inform planning decisions and to inform policy development, notably the review of the Local Plan. It is considered the principles established within this Design Charter are appropriate in a Shropshire context. This aspect of draft Policy DP5 is complemented by the remainder of draft Policy DP5, the other draft Policies within the draft Shropshire Local Plan and the NPPF. Furthermore, the draft Shropshire Local Plan also, where appropriate, specifies that for large development sites such mechanisms as Supplementary Planning Documents (SPD's) will be used to identify more detailed and location/site specific design considerations.	No
A0091	B001	Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030. Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision. Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators." Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.	No
A0091	B002	Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored. Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.	Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.	No
A0091	B003	Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years). Provide evidence that Bridgnorth can sustain a 35% population increase.	Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development. There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0091	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.
A0091	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?
A0091	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. No recognition is made that mature tree screening takes time to mature and does not provide a barrier to noise, odour and other factors associated with a livestock market. Risk of losing this important local facility. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 (or at least parts of it) could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.
A0091	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The B4364 (Ludlow Road) is the only direct access to the small area of land the promoter has under option at Round thorn Farm. This is narrow and unsuitable as the main access for the vehicular, cycle and pedestrian traffic associated with development of this scale. To create a central refuge for turning vehicles and pavements, mature hedgerows would need to be removed. The alternative access onto the A458 is through proposed industrial use which is unsuitable and unviable. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458 - clarification required on its feasibility. Alternative means of crossing have been deemed unacceptable by Highway Officers.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0091	B004	The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.	Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers. Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."	No
A0091	B005	What areas / units are already available for occupation and how long have they been vacant? What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19. If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?	Noted. Shropshire Council has undertaken an Economic Development Needs Assessment and Employment Land Review to inform the Local Plan Review. The Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Specifically with regard to employment land, this proposed strategy provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Having a supply of land which creates choice and competition in the market provides flexibility to respond to changing circumstances. Employment allocations are specifically allocated for employment purposes. Draft Policy SP13 indicates that allocated employment land will be protected for employment generating uses and alternative uses will only be supported in specific circumstances, as documented within the draft Policy.	No
A0091	B006	Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing. Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences. Provide details of how noise and odour can be mitigated in these circumstances.	Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection. Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity. Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market. Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.	No
A0091	B007	What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur. Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458. Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0091	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's, contains environmental networks and has the potential to impact on habitats for European protected species (principally bats and great crested newt). It also has the potential to impact on the non-designated habitats formed under the Planning Permission for Bridgwalton Quarry and managed by Shropshire Wildlife Trust. Species surveys need to be undertaken. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0092	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. It should be noted that the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.
A0092	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '.. will make provision for the needs of the town and surrounding hinterland...'? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?
A0092	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0091	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No
A0092	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No
A0092	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0092	B003	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0092	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?
A0092	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 (or at least parts of it) could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.
A0092	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458 - clarification required on its feasibility. Alternative means of crossing have been deemed unacceptable by Highway Officers.
A0092	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0092	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. Shropshire Council has undertaken an Economic Development Needs Assessment and Employment Land Review to inform the Local Plan Review. The Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Specifically with regard to employment land, this proposed strategy provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Having a supply of land which creates choice and competition in the market provides flexibility to respond to changing circumstances.</p> <p>Employment allocations are specifically allocated for employment purposes. Draft Policy SP13 indicates that allocated employment land will be protected for employment generating uses and alternative uses will only be supported in specific circumstances, as documented within the draft Policy.</p>	No
A0092	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0092	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0092	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0092	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's, contains environmental networks and has the potential to impact on habitats for European protected species (principally bats and great crested newt). Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0093	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. It should be noted that the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.
A0093	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '.. will make provision for the needs of the town and surrounding hinterland...'? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?
A0093	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0092	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No
A0093	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored and respond to their questions and objections.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No
A0093	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p> <p>Given current turmoil resulting from Covid 19, is it not too early to make assumptions about developing town centres - where will the finance come from?</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0093	B003	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0093	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?
A0093	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 (or at least parts of it) could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.
A0093	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458 - clarification required on its feasibility. Alternative means of crossing have been deemed unacceptable by Highway Officers.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0093	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0093	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0093	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0093	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0093	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's, contains environmental networks and has the potential to impact on habitats for European protected species (principally bats and great crested newt). Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0094	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	The strategy proposed within Draft Policy SP2 is one of urban focus. However it also recognises the rurality of much of Shropshire and the need for long term sustainability, but in so doing, indicates growth opportunities in rural areas should be more closely aligned with the ability of villages to provide a suitable standard of services and facilities. As such the draft Shropshire Local Plan is underpinned by a Hierarchy of Settlements to identify proposed Community Hubs. However, whilst draft Policy SP2 rightly identifies Community Hubs as significant rural service centres, it is unsound as it is not based on sound, up to date or accurate evidence and the treatment of change to local services and facilities have been inconsistent during the draft Local Plans development. The August 2020 Hierarchy of Settlements Assessment is the third iteration, it acknowledges and reflects the need to keep this evidence up-to-date with best available information about changing services, facilities and infrastructure (see para 2.6 of the Hierarchy of Settlements). However despite responses, including to the Regulation 18: Pre-Submission Consultation, highlighting changes to services (particularly in relation to the village of Clive), these have not been reflected within the assessment. This is inconsistent with the approach elsewhere, for instance Myddle was initially identified as a Community Hub, but following the closure of the local convenience store in 2018, fell below Community Hub status within the assessment, the same circumstances occurred in Clive but it remains a Community Hub. As such draft Policy SP2 does not take them into account and identifies Clive as a Community Hub without the necessary services and facilities.
A0094	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	Yes	Not Specified	Draft Policy SP7 recognises the importance of residential guidelines for settlements. This is consistent with draft Policies SP1 and SP2 which together seek to support the NPPF's approach to significantly boosting housing supply whilst reflecting the unique character of Shropshire's urban and rural settlements, through appropriate distribution of development. Removal of development boundaries or flexible application of housing guidelines would potentially open up further opportunity for growth, as a positive, but would also lead to uncontrolled and unsustainable development, conflict with other policies within the draft Shropshire Local Plan and lead to uncertainty on delivery which is counter to the evidence led approach and consultation processes for development of the draft Shropshire Local Plan. The purpose of the Plan is to provide a consistent framework for future development across Shropshire and as such the guidelines in draft Policy SP7 are considered important and sound.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0093	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0093	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No
A0094	B001	<p>Draft Policy SP2 should remove reference to Clive as Community Hub as current evidence on availability and accessibility of local facilities and services means it does not meet the definition of a significant rural service centre as defined by the Hierarchy of Settlements evidence base and subsequent Local Plan policies.</p>	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0094	B002	n/a	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0094	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	<p>The Hierarchy of Settlements Assessment which has informed identification of proposed Community Hubs is not based on up to date, accurate or consistent information and therefore draft Policy SP8 is not justified and is considered unsound. The Council consider the Hierarchy of Settlements Assessment has been applied consistently and responded to changing circumstances. However, despite responses, including to the Regulation 18: Pre-Submission Consultation, highlighting changes to services (particularly in relation to the village of Clive), these have not been reflected within the assessment.</p> <p>In Clive, the current scoring within the Hierarchy of Settlements Assessment for Clive includes the bowling green as an outdoor sports facility and the local convenience store, but neither of these facilities are publicly accessible to the community, following closure of both the bowling green and local convenience shop. Both now fall under private residential ownership and use.</p> <p>With regard to the bowling green, Shropshire Council recognise there is no active club in the Shropshire Council Playing Pitch and Outdoor Sports Strategy Assessment Report (Oct 2020) (PPOSS), a comprehensive assessment undertaken between 2018 and 2019 within which Clive is not recorded as having such a facility. However, Shropshire Council justify retention of the facility in Clive following its inclusion in the Open Space Needs Assessment (2017 - based on 2009 data with limited desk-based updates) (OSNA), this assessment acknowledges that "without a catchment area analysis it cannot detect the reality of variations in provision within each Place Plan Area"... this data is considered out-of-date, has not been verified locally and has been superseded by the PPOSS.</p> <p>With regard to the local convenience store, Shropshire Council has acknowledged receipt of recent correspondence from both the Parish Council and store owner that it is no longer in use and now falls within a residential curtilage. This has now been formalised with a change of use planning application to convert the store to a residential annex (ref 21/00048/FUL).</p> <p>An inconsistent approach has been taken to reflecting changes during development of the draft Shropshire Local Plan. For instance Myddle was initially identified as a Community Hub, but following the closure of the local convenience store in 2018, fell below Community Hub status within the assessment. Similar situations occurred in Cockshutt and Westbury. The same circumstances occurred in Clive but it remains a Community Hub. It is acknowledged that these changes occurred later in the development of the draft Shropshire Local Plan, but there remains a disparity. Also, for these settlements, notification from the relevant Parish Council was sufficient, but Clive Parish Council were asked for evidence of marketing more widely and suitable assurances about the potential future uses for the facility. Regarding marketing, the store was most recently let to a local resident but this quickly came to an end due to viability. The store was then marketed, but was not considered to be viable proposition and no offers were made. It was also offered to the community but no offers were made.</p> <p>This calls into question the soundness of the draft Plan's development and consultation. Whilst we recognise the need to progress with developing an up to date plan for Shropshire, the pace to push this through prior to local elections should not negate the appropriate consideration of consultation responses, follow up discussion or consideration which is critical in ensuring development of a sound plan based on credible evidence.</p> <p>Revisions to the Hierarchy of Settlements over the Plan development has led to relaxation around the requirement for Community Hubs to have employment and peak time public transport, which clearly should be fundamental to determining significant rural service centres, which has caused inconsistencies in the policy and evidence base with regard to the definition of Community Hubs - 'settlements considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities' but the assessment criteria and associated threshold not requiring such facilities to be present. Clive illustrates this point as it is at least partly reliant on other settlements to meet certain day to day needs such as employment and local convenience goods.</p> <p>The draft Shropshire Local Plan and draft Policy SP8 is therefore considered to be unsound as the methodology and application of associated evidence does not meet the intended definition of a Community Hub and overall settlement hierarchy needed to maintain overall sustainability and is therefore not justified.</p>
A0094	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	Not Specified	No	Not Specified	<p>Draft Policy SP15 is positive in that it provides a framework for long term vision of estate land within Shropshire. However, it is considered to be unsound in that other than a broad statement it does not recognise the relationship to other draft policies in the draft Shropshire Local Plan and does not set out a positive framework for how this draft Policy should work in conjunction with other policies. It is therefore not considered effective.</p> <p>In particular, draft Policy SP15 needs to be clear on the relationship with other rural settlements, particularly Community Hubs (and draft Policy SP8). Draft Policy SP15 risks spreading and merging development between defined development boundaries of Community Hubs and neighbouring estate land, significantly increasing housing numbers beyond proposed guidelines, which have been set and consulted upon as the most appropriate on sustainability and character grounds.</p> <p>The Policy needs to reflect the distinction between Community Hubs and Estate Land to ensure these policies work in combination and do not result in a sprawl of inappropriate rural development.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0094	B003	Policy SP8 should remove reference to Clive as Community Hub as current evidence means it does not meet the definition of a significant rural service centre as defined by the Local Plan Review	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirements to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0094	B004	Policy SP15 should explicitly reflect the relationship to Policies SP8, making clear that any land within whole estate plans falling within defined Community Hubs or Clusters needs to be consistent with the relevant settlement policy requirements and those of SP7 in relation to housing guidelines and development boundaries.	<p>Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal.</p> <p>Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0094	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2. Community Hubs: Wem Place Plan Area	Not Specified	No	Not Specified	<p>Draft Policy S17.2 is unsound as associated overarching draft Policies SP2 and SP8 are unsound. The policy is based on inaccurate, out of date and inconsistency evidence on settlement sustainability. In addition, there has been inconsistent consideration and treatment of the presence of local facilities and changing circumstances across Parishes during plan development. In Clive, the current scoring within the Hierarchy of Settlements Assessment for Clive includes the bowling green as an outdoor sports facility and the local convenience store, but neither of these facilities are publicly accessible to the community, following closure of both the bowling green and local convenience shop. Both now fall under private residential ownership and use. As such Clive does not meet the requirements for Community Hub status. With regard to the bowling green, Shropshire Council recognise there is no active club in the Shropshire Council Playing Pitch and Outdoor Sports Strategy Assessment Report (Oct 2020) (PPOSS), a comprehensive assessment undertaken between 2018 and 2019 within which Clive is not recorded as having such a facility. However, Shropshire Council justify retention of the facility in Clive following its inclusion in the Open Space Needs Assessment (2017 - based on 2009 data with limited desk-based updates) (OSNA), this assessment acknowledges that "without a catchment area analysis it cannot detect the reality of variations in provision within each Place Plan Area"... this data is considered out-of-date, has not been verified locally and has been superseded by the PPOSS. With regard to the local convenience store, Shropshire Council has acknowledged receipt of recent correspondence from both the Parish Council and store owner that it is no longer in use and now falls within a residential curtilage. This has now been formalised with a change of use planning application to convert the store to a residential annex (ref 21/00048/FUL). An inconsistent approach has been taken to reflecting changes during development of the draft Shropshire Local Plan. For instance Myddle was initially identified as a Community Hub, but following the closure of the local convenience store in 2018, fell below Community Hub status within the assessment. Similar situations occurred in Cockshutt and Westbury. The same circumstances occurred in Clive but it remains a Community Hub. Also, there is no evidence that other Parish Councils were required to provide additional evidence to support this change in designation other than notification of the change. In comparison, Clive Parish Council were asked for evidence of marketing more widely and suitable assurances about the potential future uses for the facility. This deferred a decision on any change. The policy is therefore not considered effective or justified and therefore unsound.</p>
A0095	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Longden	Not Specified	No	Not Specified	<p>Do not consider the draft Shropshire Local Plan or the Hierarchy of Settlement evidence base document to be sound or sustainable. Consider the Hierarchy of Settlements is inappropriate as it does not apply 'weighting' to services and facilities so large settlements are scored the same was as small settlements. For instance it seems ludicrous that a permanent library facility is scored the same as a mobile library that visits once a month. How can Longden with few employment opportunities be judged on the same basis as a larger settlement. See LVAG letter for further examples. Disagree with sites which have been included despite appeals on these sites being rejected (016 &amp; 022). With regard to the Zero Carbon target, consider building large numbers of housing in rural settlements is not sound as more residents will need to commute, increasing carbon emissions. See LVAG letter.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0094	B005	Policy SP17.2 should remove reference to Clive as Community Hub as current evidence on availability and accessibility of local facilities and services means it does not meet the definition of a significant rural service centre as defined by the Hierarchy of Settlements evidence base and subsequent Local Plan policies.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0095	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village. Review the Hierarchy of Settlements methodology.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019).</p> <p>In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.</p> <p>Shropshire Council also considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0096	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.1 Much Wenlock MUW012VAR	No	No	No	MUW012VAR is a large scale development which was not agreed in the Neighbourhood Plan. The field that regularly floods. As the town has a flood risk of rapid flooding why is a whole town solution not being sought to put in place a plan building an infrastructure that can enable any growth to happen safely.
A0097	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Longden	Not Specified	No	Not Specified	<p>Concerned the draft Shropshire Local Plan is unsound as the methodology for distributing site allocations throughout the county is flawed and irrational. The allocation of Longden as a Community Hub has not been "justified" and is not supported by the evidence. This status is inappropriate for the village and its residents. Other Community Hubs are much larger, aligning Longden with them will inevitably lead to pressure for development. Community considers remaining a Community Cluster would preserve the character of the Parish and safeguard open countryside, traditional customs and the landscape.</p> <p>The Hierarchy of Settlements methodology and scoring of Longden is flawed, blunt and wrong. Points allocations do not recognise size and capacity of facilities. No employment provision in Longden should result in a negative score. Providing the same points for a mobile library (which visits for 10 minutes once a fortnight when people are unable to use) as a permanent library is ridiculous. The Longden shop is also the post office and is very small, it is unfair that this gets so many points and the same amount of points as a settlement with multiple provision. The Longden Public transport link is regular but so infrequent it has little effect on sustainability (timetable does not allow for use by office/shop workers in Shrewsbury and connection timing prohibit onward transportation to other towns), it is wrong that this scores 10 points. Reducing points in the Settlement Hierarchy Assessment to a more realistic and rational number in these areas would lower the village points to below the Community Hub status threshold.</p> <p>Aware that other villages and individuals have concerns regarding the scoring system. This should be considered before any decision on 'soundness' is reached.</p> <p>The proposed development boundary for Longden provokes discussion regarding where and how new housing will be delivered. Shropshire Council identify exception sites. The Right Home Right Place survey highlighted particular housing need and how this is expected to be met by exception sites is unclear. do not want an unplanned adhoc approach to development resulting in the loss of high-value agricultural fields.</p> <p>Particularly concerned that previous well documented objections to the draft Shropshire Local Plan will not be presented to the examining inspector.</p> <p>Level of development proposed contradicts Core Strategy objective 3 which seeks to support rural communities by the delivery of local housing, appropriate to the role, size, and function of each settlement. The section on Longden (para 19.75) refers to a 'modest amount of additional housing'. Little weight has been given to the character and quality of the local environment and the impact further development would have on the village character as required by objective 11 of the Core Strategy.</p> <p>There has been significant development in Longden Parish (nearly double that within the SAMDev guideline). Residents now consider enough is enough. Infrastructure, road links and amenities in the village are at capacity. Others, like primary care services are only accessible via car down single track lanes. Congestion on road links (including the single link from Longden Parish into Shrewsbury) have also been exacerbated by development north and south of the village. Yet no infrastructure Plan has been prepared.</p> <p>When considering climate change and carbon emissions, it would make more sense to focus development in urban areas, saving car journeys.</p> <p>Concerned about dissemination of information, particularly during Covid 19 limitations.</p>
A0098	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Tasley Garden Village	Not Specified	No	Not Specified	<p>Proposed allocation BRD030 (Tasley Garden Village) would surround the relocated livestock market on three sides, constricting its operation and threatening viability. this contradicts the requirement to keep the market away from housing and incompatible uses.</p> <p>BRD030 has the appearance of 'deep countryside' rather than 'urban fringe', is divorced from the town, has an open parkland feel and is in the foreground of the Shropshire Hills AONB. Its development would destroy this setting.</p> <p>Development of BRD030 would impact on four SSSIs, two listed buildings and encroach on Grade 1 listed Morville Hall.</p> <p>BRD030 is on the opposite side of Bridgnorth from major towns to the north and east (Telford, Wolverhampton and Stourbridge), so commuting and business traffic will increase congestion, noise and pollution in and around Bridgnorth.</p> <p>Proposals for a pedestrian/cycle footbridge over the A458 is undeliverable as the site promoter does not own the relevant land, so residents will need to walk across the A458.</p> <p>BRD030 is not currently served by a bus service and the closest bus stop is one mile away.</p> <p>Development will initially (first 10 years) be served off the B4364 (Ludlow Road), a narrow country lane wholly inadequate for this purpose.</p> <p>Site promoters proposals do not follow Garden Village Principles.</p> <p>The level of consultation undertaken by the site promoter and subsequently Shropshire Council is minimal.</p> <p>Local Town and Parish Council's prefer an alternative site - Stanmore Garden Village.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0096	B001	<p>Shropshire Council needs to engage with residents to address flood risk for the town and show a coherent plan for managing water along the length of the River Severn and it's catchment area rather than propose building on a field that floods regularly and state that the flooding risk can be solved by a developer led solution.</p> <p>A whole town solution is needed to address all the issues – traffic (pressure on Gaskell Corner – build a bypass), Water - flooding build a system of flood defences for the town not a one off developer led solution which have not worked in the past; fresh water as Much Wenlock regularly has to have tankers pumping water into the system as there is insufficient pressure due to the growth of housing in Telford and foul water as the sewage farm is already at capacity. I believe Shropshire Council has failed to cooperate with Telford Council and Severn Trent to ensure sufficient water supplies can be maintained.</p>	<p>The proposed site allocations in Much Wenlock have been informed by a proportionate and robust site assessment process which has taken flood risk into account.</p>	No
A0097	B001	<p>Longden Parish Council have consulted the residents on several occasions recently and the overwhelming consensus is that Longden Village should be designated a Community Cluster rather than a Community Hub and the other settlements within the Parish be designated open countryside.</p> <p>Consider the scoring system for allocating points in the Hierarchy of Settlements is wrong and should be revisited to enable the new Local Plan to be deemed sound and fit for purpose.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>The proposed development strategy for Longden, including the proposed development boundary and approach to delivering the proposed development guideline, is also considered appropriate, effective, sustainable and deliverable. Specifically, recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019).</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. The Consultation Statement for the draft Shropshire Local Plan includes appendices summarising previous stages of consultation.</p>	No
A0098	B001	<p>Proposed allocation BRD030 (Tasley Garden Village) should be removed from the draft Shropshire Local Plan and the alternative site BRD032 (Stanmore Garde Village) included.</p>	<p>Noted. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth.</p> <p>Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Shropshire Council also considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0099	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.1 Wem	Not Specified	No	No	Site WEM025 should not be included – WEM033 could have its capacity increased to 90 as an alternative.
A0099	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.1 Wem Development Boundary	Not Specified	No	No	Development Boundary should be amended to run parallel with Mill Street from Roden Weir alongside the western edge of the pavement on Mill Street to the Mill House.
A0100	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Wem HDL006	Yes	Yes	Yes	Support site HDL006 and the Development Boundary
A0101	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	Not Specified	Not Specified	Not Specified	<p>Significant principal centres located near to Wyre Forest District which have been allocated development are Bridgnorth with a proposed residential development guideline of some 1,800 dwellings and 49ha or employment land and Ludlow with a proposed residential development guideline of some 1,000 dwellings and 11ha of employment land. Proposed developments close to Wyre Forest District include that within the settlements of Cleobury Mortimer (200 dwellings and 2ha of employment land), Alveley (130 dwellings), Ditton Priors (65 dwellings), Highley (250 dwellings and 3ha employment land), Burford (190 dwellings), Clee Hill (75 dwellings) and Craven Arms (500 dwellings and 5ha employment land).</p> <p>By allocating the majority of development within the strategic and principal centres, the preferred sites document appears to be consistent with sustainable development as outlined in the revised NPPF. However, have serious concerns that future development will result in adverse pressure on existing infrastructure important to Wyre Forest District, such as traffic levels on the A442 from Bridgnorth to Kidderminster and additional pressure on the Dowles Road/Welch Gate Air Quality Management Area junction in Bewdley and Stourport-on-Severn. Transport modelling work must identify highway improvements that may be necessary as a result of future development.</p> <p>In particular, the proposed allocation of 250 dwellings within Highley could adversely affect congestion in Bewdley town centre, because access from Highley would be via Dowles Road which leads to the heavily used junction with Welch Gate (an air quality management area).</p> <p>The Cleobury Mortimer Neighbourhood Plan will have to support the delivery of strategic policies contained in the Local Plan Review, as outlined in the revised NPPF.</p> <p>Welcome further employment land allocations in the Local Plan Review. Employment proposals combined with the existing strong links between Wyre Forest and Shropshire (638 out commuting and 1,037 inflowing to Wyre Forest per day) may increase these in and out migration trends (particularly as property prices in Wyre Forest are significantly lower than Shropshire).</p> <p>Strongly support protection of Shropshire Green Belt as part of the wider West Midlands Green Belt. Particularly opposed to any development within parcels BA5 and BA6.</p>
A0102	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	Not Specified	Not Specified	Not Specified	Do not consider proposals raise any cross-boundary strategic issues.
A0103	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Gobowen GWR023	Not Specified	No	No	GWR023 was a preferred site at Reg 18 in November 2018 however no discussion or explanation has been given for its exclusion. Access to the site can be directly through the recent consent 15/04473/REM off Whittington Road. Since the previous Local Plan Review, we have slightly amended the proposed boundary to take into account the partial flooding on the land. Our previous submission included land within the flood zone, with this current submission we have moved the proposed site boundary to avoid any development within the flood zone.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0099	B001	Remove WEM025 as an allocation, possibly increase WEM033's guideline to meet the loss	Noted. Shropshire Council considers that the proposed development strategy for Wem and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0099	B002	Development Boundary should be amended to run parallel with Mill Street from Roden Weir alongside the western edge of the pavement on Mill Street to the Mill House.	Noted. Shropshire Council considers that the proposed development strategy for Wem and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Shropshire Council also considers that the proposed development boundary is appropriate. We would note that with regard to the design of development, a draft Policy (SP5) specifically on high-quality design is proposed within the draft Shropshire Local Plan. Furthermore draft Policy S11.1 recognises development proposals should positively respond to community-led plans, this includes in relation to design.	No
A0100	B001	n/a	Noted.	No
A0101	B001	Confirm transport modelling is to be undertaken.	Noted. Draft Policy DP25 states that new development should only take place where there is sufficient existing infrastructure capacity available or any necessary improvements are funded through developer contributions or other means. This of course applies to all development proposals and forms of infrastructure, including highways. -The draft site guidelines for proposed allocation BRD030 in Bridgnorth specifically reference the need to make any necessary improvements to the wider highway network informed by Strategic and Local Transport Assessments. Whilst the draft site guidelines for proposed allocations P58a and STC002 specifically reference the need to undertake necessary improvements to highways infrastructure. -The draft site guidelines for proposed allocations LUD056 and LUD052 in Ludlow specifically reference undertaking highway improvements informed by appropriate Transport Assessments. -No new allocations are proposed in Craven Arms. -A Neighbourhood Plan is being progressed for the Cleobury Mortimer Parish area. The Neighbourhood Plan will include the strategy for achieving the housing and employment guidelines for the Key Centre of Cleobury Mortimer. However as specified above, draft Policy DP25 would of course apply to any development proposed in this settlement. -As specified above, draft Policy DP25 would apply to any development, including of the proposed allocations, in Alveley, Buford, Ditton Priors and Clee Hill. -Draft Policy DP25 would also apply to all development in Highley. For the sake of clarity a minor modification is proposed to the draft site guidelines for proposed allocation HNN016 to confirm that of course all necessary highway improvements will be undertaken, informed by an appropriate Transport Assessment, in accordance with draft Policy DP25.	Yes
A0102	B001	n/a	Noted.	No
A0103	B001	The plan should be modified to include this site as a logical and sensible continuation of the existing development, and reinstate it's former status as a preferred housing allocation.	GWR023 was indeed a preferred allocation within the Reg-18 Preferred Sites Consultation (November 2018) document, however it was removed as a preferred allocation as part of the Reg-18 Pre-Submission Draft of the Shropshire Local Plan (Aug 2020), and this remains the case at Reg-19 stage. It should be noted that when GWR023 was a preferred allocation, it was immediately N of the existing consent and immediately adjacent to Fernhill Lane. As the SE corner of GWR023 lay in a flood area, Shropshire Council needed data from the SFRA Level 2 before a confirmed decision could be made on the site for the August 2020 Reg-18 stage. This data was received fairly late, and so very shortly after this was received, the document needed publishing, however the data confirmed that no access points should run through the site's SE corner (i.e. off Fernhill Lane). As this was the only possible access due to the design of the now-extant consent blocking off any possible access, the site was removed as it was inaccessible. This, contrary to the representation, was explained to the site promoters in an email thread in August 2020. It was also discussed "shifting" GWR023 to the west slightly - avoiding all the flood area and having access through the existing consent to the south. However, at the time the design and positioning of the housing in the existing consent meant that no access could go through the site northwards. A representation was subsequently submitted as part of the Aug 2020 Reg-18 Consultation for this "shifted" site, however it relied on an access through a semi-detached house whereby there were no applications to amend the scheme to remove this dwelling. The council was therefore not confident in the accessibility of this shifted site, and retain this stance.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0104	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8 & SP9	Not Specified	No	Not Specified	Consider Welshampton should be a Community Hub or a Community Cluster within the draft Shropshire Local Plan. The settlement is currently identified as countryside and no provision for housing to support the local community has been made, this is considered unsound. Welshampton was previously a Community Cluster and is located on the A495 road in close proximity to the town of Ellesmere. Welshampton has a number of local amenities including a primary school, parish hall, hairdressers, garage and public house. A significant amount of housing relies on these amenities. Site promoted within the village, which is considered a natural extension to an existing site with Planning Permission (ref no: 14/01603/OUT & 17/03500/REM - plan attached to representation) with an appropriate density and appearance of development.
A0105	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S4.1 Broseley	Not Specified	No	Not Specified	Consider the proposed development strategy for Broseley is unsound as there are no residential allocations proposed. Consider land situated to the east of Ironbridge Road (site plan appended to representation) would be highly appropriate for residential development as it is brownfield land, situated close to the two sites allocated for employment development, and benefits from good road access. This site could accommodate a range of housing that would complement and enhance nearby employment and should be included in the development boundary for the settlement. The site has been discussed with the Parish Council in the context of the Neighbourhood Plan and they indicated it may have potential for affordable/subsidy housing.
A0106	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S8.1 Ellesmere	Not Specified	No	Not Specified	Proposed allocation ELL005 & ELL008 is accepted as being a positive benefit in terms of housing delivery. Understand a Planning Application has been submitted for 107 dwellings and is currently being considered. It has the support of the Town Council and the local community and will be a positive benefit to the town. However consider the draft Shropshire Local Plan relies too heavily on the mixed development allocation ELL003a & ELL003b within the adopted Local Plan, which has been slow to deliver much-needed housing. Given concerns about delivery of this site and in order to create a wider range of development opportunities consider there is clear potential for a further site to be allocated for residential development. It is considered that all or part of the land off Elson Road (see site plans appended to this representation) has the potential to be included as either an allocation or held in reserve for release during the Plan period should a shortfall in delivery occur. The remainder of the site would be available for allocation within the next Local Plan Review and has the potential to deliver a strategic link road (illustrated on plans appended to the representation). This site has been identified as having long term potential, with particular regard to providing a strategic link road, and has been pursued in a phased development in this way, in association with adjoining landowners.
A0107	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 Whitchurch	Yes	No	Yes	Whitchurch has been identified as a Principal Centre with three site proposed for allocation. As a Principal Centre, consider a broader portfolio of sites should be identified for allocation in order to maximise housing delivery and offer the widest possible range of dwellings. Have previously promoted land in Whitchurch (plans appended to this representation) which provides scope for delivery of housing and it appears the Council has not given sufficient consideration to the benefits of this site. It has the potential for access from the bypass thus avoiding adding congestion onto roads in the town, it is within walking distance of a range of local services and facilities and there are also a range of facilities and services proposed for the site (including medical facilities, leisure and recreation).
A0108	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7 and S16.1 Shrewsbury	Yes	No	Yes	Shrewsbury has been identified as a Strategic Centre. A major role of a Strategic Centre is to provide a range of site allocations to increase chances of delivery. However, many of the sites proposed for allocation in Shrewsbury do not have reasonable scope for immediate delivery. For example: SHR173 is reliant on the construction of the North West Relief Road (NWRR), which does not yet have Planning Permission. SHR060, SHR158 and SHR161 is large and complex meaning it will take many years to be delivered. Suggest inclusion of land at Bicton (plan appended to representation) to provide scope for immediate delivery as it has no constraints in relation to highways, drainage, ecology etc. It appears that Council did not give sufficient consideration to the benefits of this site to deliver housing. This site is in proximity of existing development and infrastructure, the proposed North West Relief Road and Shrewsbury West Urban Extension (logical extension of this site). It lies in a sustainable location adjacent to Bicton, Bicton Heath and the eastern fringe of Shrewsbury. The site has the potential to help meet future housing requirements of both open-market and affordable units, and support the growth of the Shrewsbury urban area.
A0108	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7 and S16.2 Ford	Yes	No	Yes	Ford has been identified as a Community Hub, however one residential allocation is proposed. The Council should have a duty to allocate more than one site to provide more potential for delivery. Proposed allocation FRD011 will be a dominant feature when passing through the village via the A458. Suggest inclusion of our land in the heart of Ford (plan appended to representation) as it provides scope for housing in the historic heart of the village and offer the potential for other facilities which are beneficial to the village in the future. It appears the Council did not give sufficient consideration to the benefits of this site to deliver housing, albeit initial discussions occurred. This site benefits from good access to the A458 and is within walking distance of a range of local facilities.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0104	B001	Welshampton should be a Hub or Cluster in the Local Plan.	Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Welshampton. As such it is considered appropriate that Welshampton is not identified as a Community Hub. Community Clusters are settlements with aspirations to maintain or enhance their sustainability. Welshampton has not been identified as such a settlement through the Local Plan Review process. Draft Policy SP10 identifies the circumstances within which residential development in the countryside can occur, including within Welshampton.	No
A0105	B001	Include land east of Ironbridge Road (see site location on appendix to representation) within the settlements development boundary.	Noted. A Neighbourhood Plan is being progressed for the Broseley Town Council area. The Neighbourhood Plan will include the strategy for achieving the housing and employment guidelines for the Key Centre of Broseley.	No
A0106	B001	Include all or part of land north of Elson Road (see site location on appendix to representation) as either an allocation or a reserve site should a shortfall in delivery occur.	Shropshire Council considers that the proposed development strategy for Ellesmere and the existing commitments (including the existing allocations), proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken, including consideration of this promoted site.	No
A0107	B001	Consider allocation of site promotion (plans appended to representation) at Whitchurch.	Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0108	B001	Consider allocation of site promotion (plans appended to representation) at Bicton, Shrewsbury.	Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.	No
A0108	B002	Consider allocation of site promotion (plans appended to representation) at Ford.	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Ford. Consequently, it is considered appropriate that Ford is identified as a proposed Community Hub and it is further proposed to identify a development guideline, development boundary and a housing allocation on site FRD011 consistent with other rural settlements considered to be appropriate for designation as a Community Hub for policy purposes. Shropshire Council also considers that the proposed development strategy for Ford and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this other promoted site. The development boundary is focused on the area of the village directly fronting onto the A458 Trunk Road or serviced from the primary junction with the A458 at But Lane. The development boundary provides for the allocation at FRD011 and will permit further small scale windfall development to meet a modest allowance for the remaining plan period to 2038. The anticipated windfall development is expected to reflect the pattern of recent approvals for small housing schemes in the village. It is therefore considered that Ford is appropriately designated as a Community Hub in the draft Shropshire Local Plan and that suitable provision has been made for housing development to meet the development guideline for the village.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0109	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Shifnal	Not Specified	No	Not Specified	Aware of the need for housing, but don't want it to blight the lives of people already living in small towns and villages in the County. Shifnal has already had more than its share of development. Infrastructure in Shifnal cannot cope with current loads, never mind any more associated with new development (particularly roads (also in need of repair), GP surgery (expansion promised for years), schools, parking difficulties (making the settlement a dormitory as people spend their money elsewhere). Agricultural land should be protected to grow crops, instead extensive brownfield land within the West Midlands should be developed. Shifnal has lost much of its identity.
A0110	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Hanwood	Yes	No	Yes	Hanwood has been identified as a Community Cluster, however consider the housing guideline cannot be delivered within the out-of-date development boundary. To accommodate the proposed 'windfall' dwellings, it is necessary to either extend the development boundary or allocate new sites for residential development. This has already happened in that two large development sites have occurred beyond the development boundary in the adopted Local Plan. Suggest Policy S16.2 is amended to propose an extension to the development boundary for Hanwood to include land west of Orchard Lane as an allocated site (plan appended to representation). This site (HWD005) has previously been identified as a "Long Term Potential" residential site in the SLAA. this site could deliver an upgrade to Orchard Lane and the unmade track to Highfield, which would represent significant benefits to the community. The landowners through their agents are continuing to talk with the local highways authority regarding existing highway concerns and are considering making a Planning Application for the confirmation of existing recently approved development.
A0111	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S12.1 Pontesbury	Yes	Yes	Not Specified	Pontesbury Parish Council has been adequately consulted. Sites identified are capable of delivering required number of houses within the time span of the plan.
A0112	BTLU	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3	Not Specified	No	Not Specified	Many reasons why proposals for large-scale housing and industrial development, at BRD030, are unsound. Agree with the detailed objections made by Tasley Parish Council and Bridgnorth Town Council and specified individuals. Object to the misleading description of 'Tasley Garden Village', when development proposals are for a high-density housing estate and a large amount of industrial units. The principles for development of Garden Settlements, established by the Town and Country Planning Association, will undoubtedly be ignored/not enforced and proposals will be unsustainable. Shropshire Council has disregarded the large number of responses to Regulation 18 consultation and the views of Bridgnorth's community.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0109	B001	Reduce the level of growth in Shifnal.	On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038.	No
A0110	B001	Suggest Policy S16.2 is amended to propose an extension to the development boundary for Hanwood to include land west of Orchard Lane as an allocated site. This site (HWD005) has previously been identified as a "Long Term Potential" residential site in the SLAA.	Noted. Shropshire Council considers that the proposed development strategy for Hanwood and the existing commitments (including the existing allocation) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. It has also been informed by a proportionate and robust site assessment process has been undertaken, including consideration of this promoted site as part of a wider site promotion.	No
A0111	B001	N/A	Noted.	No
A0112	BTLU	Remove any proposals for development (housing or employment) on BRD030, south of the A458.	Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed site guidelines for BRD030 provide a framework for any future development of the site. They includes that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character." Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0113	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP25 and Para 4.224	Yes	No	Yes	<p>Consider draft Policy DP25 and para 4.224 of its explanation are inconsistent with the tests of soundness identified in para 35 of the National Planning Policy Framework (NPPF). Specifically:</p> <ul style="list-style-type: none"> <li>-The draft Shropshire Local Plan is not positively prepared, as it has not taken into account the requirement for emergency services infrastructure. This is of concern given that the requirement to deliver 30,800 dwellings during the proposed Plan period, without emergency services infrastructure being included within new large scale residential development, the service will ultimately become stretched.</li> <li>-There is no justified reason why the emergency services have been excluded from infrastructure provision. Development proposed during the proposed Plan period and the Planning White Paper proposals (300,000 new homes per annum across England), will clearly impact emergency services through a rise in the number of 999 and 101 calls in areas where new development takes place relative to existing levels; associated increases in the number of incidents that the emergency services will have to attend; and need for the delivery of day-to-day neighbourhood policing. Therefore, there is a demonstrated need for planning obligations to fund police equipment, vehicles and provision or upgrade of premises to maintain the delivery of community policing across the Local Authority area to promote safe and cohesive communities. Existing funding sources or the expanded Council Tax Base are insufficient to overcome this shortfall. This requirement is deemed fully compliant with statutory requirements for Community Infrastructure Levy (CIL) spend (Reg 122 of the CIL Regulations) and paras 54 and 56 of the NPPF. Appendix 1 of the representation includes 12 Secretary of State and 24 Planning Inspectorate decisions demonstrating precedent for this.</li> <li>-Regarding effectiveness, exclusion of the emergency services from para 4.224 of the Explanation to draft Policy DP25 means the draft Shropshire Local Plan will not provide an effective basis for work between Shropshire Council and West Mercia Police (WMP) on this matter. Nor will it provide the clarity needed for developers. This is detrimental to all parties, but most of all to WMP and the other emergency services, as they will be left unable to seek mitigation for the negative infrastructure impacts of development growth upon them.</li> <li>-Para 4.224 of the explanation to draft Policy DP25 as worded does not comply with paras 16, 26, 28, 32 and 41 of the NPPF, which emphasise the need for new schemes to be delivered through joint working of all partners involved with or affected by a development proposal. They are also not consistent with the NPPF in delivering safe and sustainable communities through new development. Para 91 and 127 of the NPPF seeks environments where crime and disorder and the fear of crime do not undermine of life, health of communities and community cohesion. Emergency services infrastructure is necessary to ensure that future development within Shropshire maintains a safe and secure environment through the provision of both social and security infrastructure (paras 8, 20, 26, 32 and 92 of the NPPF).</li> </ul> <p>Finally, para 95 of the NPPF states planning policies and decisions should promote public safety and security requirements by using the most up-to-date information available from the police: <u>who are essential local workers providing frontline services to the public according to Annex 2 of the NPPF</u></p>
A0113	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Yes	Yes	Yes	<p>Consider draft Policy SP6 meets the tests of soundness.</p> <p>Point 4(b) of draft Policy SP6 promotes the use of Secured by Design to reduce crime and antisocial behaviour. This is in accordance with the National Planning Policy Framework (NPPF), as paras 91 and 127 seek environments where crime and disorder and the fear of crime do not undermine the quality of life, health of communities and community cohesion. This in turn is supported by paras 124 – 126 of the NPPF, which make clear that Local Plans should detail a clear design vision and state what is expected of applicants when proposing development schemes. Additionally, the policy aligns with paragraph 95 in ensuring planning policies and decisions promote public safety and security requirements by using the most up-to-date information available from the police. It is also consistent with the National Planning Practice Guidance (NPPG).</p> <p>Draft Policy SP6 will also help to promote joint working with West Mercia Police (WMP) by scheme promoters on new developments.</p>
A0114	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	<p>Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ.</p> <p>It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored.</p> <p>A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0113	B001	Revise para 4.224 of the Explanation for draft Policy DP25 to include reference to emergency services infrastructure.	For the purpose of clarity it is considered appropriate to include a minor modification to para 4.224 of the explanation of draft Policy DP25 to include reference to emergency service facilities.	Yes
A0113	B002	N/A	Noted.	No
A0114	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0114	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030).</p> <p>At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers ‘.. will make provision for the needs of the town and surrounding hinterland...’?</p> <p>In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?</p>
A0114	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	<p>The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p> <p>The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the “sustainable urban extension” stated in the Local Plan.</p>
A0114	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth.</p> <p>However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0114	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0114	B003	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0114	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0114	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site.</p> <p>Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18.</p> <p>It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated?</p> <p>BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.</p>
A0114	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan.</p> <p>Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment.</p> <p>Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458.</p> <p>Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network.</p> <p>The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.</p>
A0114	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference?</p> <p>Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters?</p> <p>Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?</p>
A0114	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published?</p> <p>Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated.</p> <p>There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth?</p> <p>BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0114	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0114	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0114	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0114	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0115	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.
A0115	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '.. will make provision for the needs of the town and surrounding hinterland...'? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?
A0115	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.
A0115	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0115	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No
A0115	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0115	B003	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0115	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0115	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site.</p> <p>Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18.</p> <p>It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated?</p> <p>BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.</p>
A0115	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan.</p> <p>Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment.</p> <p>Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458.</p> <p>Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network.</p> <p>The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.</p>
A0115	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference?</p> <p>Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters?</p> <p>Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?</p>
A0115	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published?</p> <p>Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated.</p> <p>There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth?</p> <p>BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0115	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0115	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0115	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0115	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0116	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Not Specified	No	Not Specified	Consider the draft Shropshire Local Plan is unsound as Clive should not be identified as a Community Hub. Clive's Community Hub status is informed by outdated and inaccurate information within the Hierarchy of Settlements Assessment. Specifically the bowling green and village shop attributed points for Clive within the assessment do not exist. As such Clive would only achieve 47 points, below the threshold for Community Hub status.
A0117	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Not Specified	No	Not Specified	Consider the draft Shropshire Local Plan is unsound as Clive should not be identified as a Community Hub. Clive's Community Hub status is informed by outdated and inaccurate information within the Hierarchy of Settlements Assessment. Specifically the bowling green and village shop attributed points for Clive within the assessment do not exist. As such Clive would only achieve 47 points, below the threshold for Community Hub status.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0116	B001	Update the Hierarchy of Settlements and remove Community Hub status from Clive.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0117	B001	Update the Hierarchy of Settlements and remove Community Hub status from Clive.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0118	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S10.2 Burford	Yes	Yes	Yes	<p>Support identification of Burford as a Community Hub. As recognised within para 5.141 of the Draft Shropshire Local Plan, Burford in combination with Tenbury Wells is an important service centre for surrounding communities (Burford could be a Key Centre, if the services and facilities in Tenbury Wells were also taken into account). There are a wide range of existing services and facilities and employment provision in Burford and a wide range of shops and other services in Tenbury Wells. As such Burford is a highly sustainable settlement. For the purposes of the draft Shropshire Local Plan, it is accepted that identifying Burford as a Community Hub is justified.</p> <p>The adopted SAMDev Plan has restricted growth in this locality. As such the allocation of around 190 dwellings at Burford provides an important opportunity to ensure ongoing vitality and viability of its services and facilities and allows the settlement to grow in a manner that is commensurate to its size and importance. Recognise that this is a high guideline compared to other Community Hubs, however this is considered appropriate given the range of services and facilities in Burford and its position in the settlement hierarchy when the full range of services are considered with neighbouring Tenbury Wells.</p> <p>Delivery of new dwellings in Burford through proposed allocations, supplemented with appropriate small-scale windfall residential development within the development boundary (where it is consistent with Community Hub Policy SP7 and other relevant policies), is also supported as a way to ensure the growth assigned to the settlement is delivered.</p> <p>Support proposed allocation of BUR004 for 100 dwellings, including a range of housing with potential for self-build, family housing, age specific/special needs housing and affordable homes. Masterplan for development of the site provided within the representation demonstrating compliance with proposed site guidelines. Capacity of the site is informed by initial technical assessments and consideration of constraints and opportunities (documented within the representation).</p> <p>Fully committed to bringing this site forward for residential development and recognise the important role that it will have in helping to deliver the Council's housing need and the sustainable growth of Burford.</p> <p>Comments on proposed site guidelines for proposed allocation BUR004 are:</p> <ul style="list-style-type: none"> <li>-Dwellings will include an appropriate mix and site capacity have been informed by constraints and will respond to identified issues. This will be further refined by more detailed assessment work - consider capacity should be approximately 100 dwellings to respond to this.</li> <li>-Open space location will reflect proposed site guidelines and will respect the heritage of the Tenbury – Bewdley railway. The Heritage Note prepared for the site concludes there are no major archaeological constraints to the residential development of the site. Open space will assist in retaining the sites open character and landscape planting will soften the edge of the settlement and help it to assimilate with the River Teme Valley.</li> <li>-A Phase 1 Ground Investigation can accompany an Outline Planning Application for the site to address ground contamination. Development will ensure this is safely remediated.</li> <li>-Site specific flood risk assessment (including hydraulic modelling) will be undertaken to inform any future Planning Application and refined proposals. Proposed layout is set back from areas of known/suspected flood risk (accommodated in open space). All surface water runoff from the development will be directed to an attenuation pond ensuring no flows are directed towards neighbouring properties on Boraston Drive. Best practice Sustainable Drainage Systems (SuDS) methods will be used, designed to discharge clean water from the attenuation pond into the watercourse (at a low greenfield equivalent run off rate). This will help lessen the impact on the River Teme SSSI, as this currently suffers from water pollution as a result of agricultural run-off. The existing culverted watercourse to the east of the site will be re-naturalised to provide ecological benefit and potentially surface water flood risk betterment by increase flood storage.</li> <li>-The site would be served off the A456 (priority controlled T Junction). Feasibility of secondary pedestrian/cycle access to Boraston Drive will be confirmed ahead of any Planning Application.</li> <li>-Highways Consultant has reviewed Highways England comments at Reg 18 Consultation and advised based on a 100 dwelling scheme, as a worst case scenario, the site would likely generate approx. 60 two-way vehicle trips during a typical weekday peak hour (AM and PM). Would expect approx. 10% of vehicle trips associated with the site to pass through the A49/A456/Wyson Lane crossroads junction, translating to just six two-way vehicle trips during a typical weekday peak hour. Spread evenly, that would be one vehicle every 10 minutes, but even if all six vehicles arrived at the junction at the same time (highly unlikely given distances), wouldn't expect a lasting issue. Consider a much larger proportion of development traffic (than 10%) could route through to the junction, before impacts would begin to be felt. Therefore, do not expect proposed development of BUR004 would result in an impact on operation of the A49/A456/Wyson Lane crossroads junction and it is not expected that mitigation works at this location would be necessary.</li> <li>-Utilities Assessment will be provided to support any Planning Application.</li> </ul> <p>Note comments to previous consultations reference use of the site as parking for the Tenbury Show. however this was only allowed on a temporary bases at the landowners discretion and does not constitute a formal use or impact on the ability for development to occur.</p>
A0118	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	Yes	Yes	<p>Strategic approach set out in draft Policy SP2 which aims to see Shropshire flourish, with new development that meets its needs and makes its settlements more sustainable, is supported and considered fully in accordance with the aims of the National Planning Policy Framework (NPPF) and associated guidance. It also proposes to significantly boost housing supply and meet unmet needs arising in neighbouring areas and is therefore sound and in accordance with the Duty to Cooperate.</p> <p>Proposed housing requirement is in full accordance with up to date guidance on setting a sound and robust housing requirement. Recent changes to the standard methodology for calculating local housing need do not directly impact on Shropshire but do impact on the wider region (35% increase for Wolverhampton and Birmingham, which already have significant unmet need). Government proposals for additional financial support for these areas and changes to Permitted Development rights/evolving nature of town centres following Covid 19 will create further opportunities for housing delivery, however, unmet need in these areas will increase. Shropshire can absorb additional unmet need within its proposed housing strategy, providing further assistance to the wider region. Furthermore post Covid 19 highly likely people will wish to live in homes with more outdoor space and with space for a home office and perhaps less demand for high density urban living, further emphasising why Shropshire should take additional unmet need.</p> <p>Welcome commitment to keeping availability of land (both for housing and employment) 'under review', this is critical particularly for housing. Believe that the allocation of sites such as BUR004, which can deliver new dwellings, quickly, in the early years of the Plan period, is a positive step towards achieving a supply throughout the Plan period.</p> <p>Note proposal to focus development in urban areas. However, as the Council recognise, the long-term sustainability of rural communities is essential and new development is needed to ensure the ongoing vitality and viability of local services for these communities. Complementing growth of urban areas in particular in Community Hubs (such as Burford) which function as 'rural service centres' and contain a range of services and facilities, which provide an important focus for smaller settlements nearby, is fully in accordance with the guidance contained within para 78 of the NPPF.</p> <p>Draft Policy SP2 identifies Burford as a Community Hub, however the Hierarchy of Settlements Assessment recognises that it is a very sustainable settlement with a score equivalent to a Key Centre (identified as a Community Hub rather than a Key Centre due to its relationship to Tenbury Wells). Accept this rationale but consider the immediate proximity of services and facilities in Tenbury Wells should not be forgotten in recognising the sustainability of Burford, as it is more sustainable than a typical Community Hub Settlement.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0118	B001	Capacity for BUR004 should be expressed as 'approximately 100 dwellings; to allow for a reasonable amount of flexibility in dwelling numbers, in response to a more detailed assessment of the site's capacity.	Shropshire Council welcomes the support for Policy S10.2 recognising that the town of Burford is appropriately designated as a Community Hub and that the strategy will provide an opportunity to deliver new housing in Burford to support the rural area around the Market Town of Ludlow and also the adjacent town of Tenbury located in Worcestershire. This strategy identifies two preferred housing allocations comprising BUR002 and BUR004. The development guidelines for these sites identify an indicative capacity for the proposed development subject to the proposed design, any constraints to the development and the need for mitigation measures. Consequently, it is expected that the guideline site capacity may be merely an indication of the site capacity and it is already assumed that the site may out-turn a number of dwellings that will approximate to the guideline figure.	No
A0118	B002	N/A	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0118	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Yes	Yes	Yes	Identification of Community Hubs (including Burford which is more sustainable due to proximity to Tenbury Wells) as significant rural service centres and the focus for development in rural areas where appropriate development will be permitted on allocated sites, is supported. This accords with para 78 of the National Planning Policy Framework (NPPF) as it will enhance and maintain the vitality of rural communities and will allow them to grow and thrive. The criteria proposed within draft Policy SP8 are appropriate and generally supported. Consider proposed allocation BUR004 adheres with these proposed criteria (table and masterplan provided within representation demonstrating compliance with each criteria).
A0118	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Yes	Yes	Yes	In Para 2a of draft Policy DP1 it is considered that wording should refer to the need for an up to date Local Housing Need Survey, to ensure housing delivery reflects need at that point in time, rather than a snapshot in time, sometime over the 22 year Plan period. In Para 2b of draft Policy DP1 it is considered the proposed split should be the starting point which schemes should have due regard to, not a definitive requirement. Para 2a and 2b should also recognise that the mix of the remaining open market housing provision should have regard to housing market demand. The masterplan for proposed allocating BUR004 (provided within the representation) show how a range of different housing types can be accommodated on the site.
A0118	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Yes	Yes	Yes	Note proposed requirement of part 2 of draft Policy DP2. Consider proposed allocation BUR004 is able to provide 10% of the total 100 dwellings as plots for Self-Build/Custom-Build homes.
A0118	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Yes	Yes	Yes	Do not object to the proposed requirement for 20% affordable housing on proposed allocation BUR004. Requirements c. to f. of draft Policy DP3 are noted. However consider these are detailed matters for S106 Agreements and should be considered on a site by site basis e.g. it may not be appropriate on every site to deliver all the affordable dwellings by completion of 50% of the market dwellings, and for some areas depending on housing need the tenure split of the affordable may need to be varied from the 70/30 split proposed.
A0118	B007	Sustainability Appraisal	Sustainability Appraisal	Yes	Yes	Yes	Generally agree with the findings of the SA and consider the site to be worthy of its 'Good' score. However, criteria 5 attributes positive '+' scores when a site is within 480m of one or more of the facilities listed. Consider this criteria doesn't reflect that proposed developments have the ability to provide facilities such as children's playgrounds, amenity green space and accessible natural green space, which would further enhance the site's sustainability. Request consideration is given to allotting further 'positive' scores when a site proposal will provide such benefits.
A0119	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0118	B003	N/A	Noted.	No
A0118	B004	Amend para 2a of draft Policy DP1 to reference up to date Local Housing Need Survey. Amend para 2b of draft Policy DP1 so that the proposed split is the starting point and not a definitive requirement. Amend para 2a/2b of draft Policy DP1 to include reference to the mix of the remaining open market housing provision having regard to housing market demand.	Noted. It is considered that para's 2a/b of draft Policy DP1 provide an appropriate balance between ensuring that new development will include an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) about housing mix requirements, and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand. Specifically with regard to para 2a, it references the need for a Local Housing Need Survey to be undertaken within the last 5 years (reflecting the review cycle for the 'Right Home Right Place' Local Housing Need Survey) and as such ensures that the evidence informing the housing mix on a site is up to date.	No
A0118	B005	n/a	Noted.	No
A0118	B006	Requirements c. to f. of Policy DP3 should be deleted to ensure flexibility and enable the Authority to best respond to its housing need at that time.	Noted. Shropshire Council consider requirements identified within paras 1.c. to 1.f. of draft Policy DP3 are appropriate and provide certainty to all including the decision maker, development industry and local communities.	No
A0118	B007	Update scoring of Criteria 5 to reflect where sites will provide facilities on site.	The provision of facilities and amenities is considered at the planning application stage when the details of a proposal are known. Such issues cannot be taken into account at the Plan making stage and thus cannot form part of any SA. No change proposed.	No
A0119	B001	Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored. Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.	Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0119	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030).</p> <p>At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers ‘.. will make provision for the needs of the town and surrounding hinterland...’?</p> <p>In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?</p>
A0119	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	<p>The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p> <p>The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the “sustainable urban extension” stated in the Local Plan.</p>
A0119	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth.</p> <p>However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0119	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0119	B003	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0119	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0119	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site.</p> <p>Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18.</p> <p>It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated?</p> <p>BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.</p>
A0119	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan.</p> <p>Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment.</p> <p>Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458.</p> <p>Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network.</p> <p>The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.</p>
A0119	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference?</p> <p>Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters?</p> <p>Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?</p>
A0119	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published?</p> <p>Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated.</p> <p>There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth?</p> <p>BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0119	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0119	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0119	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0119	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0120	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.
A0120	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '.. will make provision for the needs of the town and surrounding hinterland...'? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?
A0120	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.
A0120	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0120	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No
A0120	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0120	B003	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0120	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0120	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site.</p> <p>Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18.</p> <p>It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated?</p> <p>BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.</p>
A0120	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan.</p> <p>Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment.</p> <p>Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458.</p> <p>Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network.</p> <p>The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.</p>
A0120	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference?</p> <p>Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters?</p> <p>Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?</p>
A0120	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published?</p> <p>Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated.</p> <p>There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth?</p> <p>BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0120	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0120	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0120	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0120	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0121	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.2 Alveley	Yes	No	No	Accept Hub status, however the proposal to release green belt land adjacent to the Cleckars to provide for 35 new dwellings is unsound and fails to comply with the duty to co-operate. In the Parish Council's response to the Regulation 18 Pre-submission draft of the Local Plan it was clearly stated "The Parish Council would prefer this site (ALV009) to be retained within the green belt; there are ecological and hydrological issues with the site which Councillors feel have not adequately been taken into account". The Parish Council's view on this proposal has hardened as a result of the recent plan to construct up to 100 park homes on the Butts Caravan site in Alveley. Although this may not be legally relevant in planning terms, it will create additional problems for local services and argues against proposed housing developments elsewhere in the Village, especially on green belt land at the Cleckars site. There are also much-needed infrastructure improvements necessary for the area.
A0122	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	Shropshire Council has produced a Local Plan Review which includes a "Hierarchy of Settlements" which is flawed, unsound. This hierarchy has allocated points to a selection of criteria for the selection of "Hub" status for settlements. Two of the criteria are "significant employment" and "peak time public transport". Hub status given to settlements must have both "significant employment" and "peak time public transport", This has not been achieved in this policy. It is unsound. Indeed this policy seems to contravene the councils own adopted policy on climate change and sustainability objectives. I believe this is covered in the adopted "Climate Change Emergency" policy proposed SP3 Climate Change and Sustainability Objectives SO5/6 & 12. The objective of which is to reduce car travel to reduce carbon emissions. Indeed the way allocation of points to indicate what should be a "Hub settlement" seems in itself unsound. Why should points be awarded for children's playground in a village green space with a football field be used to ameliorate for lack of points for peak time public transport? Why 48 points to gain the title of "Hub" status. Why not 42 which it is written to be the answer to everything. Indeed the composition of this points table is flawed making the "Hierarchy of Settlements" unsound. As Policy SP2 - Strategic Approach Para 6 and SP2.2 Community Hubs relies on the Hierarchy of Settlements as its Evidence Base it must also be unsound.
A0122	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Trefonen	Not Specified	No	Not Specified	Trefonen does not have "significant Employment opportunities" or "peak time public transport". Trefonen has been proposed as a "Hub Settlement". It is the only proposed "Hub Settlement" that have neither of the above key requirements. Giving Trefonen "Hub" status would contravene the substance on SP3 Climate Change and Sustainability Objectives SO5/6 & 12. Trefonen as a "Hub Settlement" is unsound.
A0123	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Introduction	No	No	Yes	With regard to para's 2.19 and 2.21, support aspirations and proposals to create a supportive environment for economic growth in Shropshire, and the need to carefully balance the need to protect the local environment and historic assets. Question the statement that 'decisions taken on land designations have been done so having regard to a full balance of considerations, with the aim of achieving sustainable development'. Proposed extent and nature of development and site designations in and around Oxon Hall caravan park are not deemed to represent sustainable development and will have a detrimental impact on existing businesses and the local environment.
A0123	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Vision	No	No	Yes	Support the principle of the Vision. Would seek assurances that planning applications will be determined with the Vision and aspirations of the Local Plan as a material consideration. The Vision makes it clear development which impacts negatively on public safety, health and economic productivity will be resisted. Given the extent and form of development proposed at Shrewsbury Sustainable Urban Extension (SUE) West and within the NWRR, consider these developments will result in detrimental levels of noise, air and light pollution to Oxon Hall caravan park, contrary to the Vision.
A0123	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Policy Map - Shrewsbury Inset	No	No	Yes	Note sites on Castle Foregate and Sentinel Works are identified as protected employment sites on the draft Policy Map - Shrewsbury Inset. Understand this designation is supportive in principle of expansion and improvement of existing operations, so no comments at this stage. However, note potential conflict with the Big Town Plan (also subject to consultation) which proposes office and residential uses in this location. Support employment uses as proposed rather than these alternative uses. Have significant concerns regarding impact of proposals for the North West Relief Road and applications within the Shrewsbury West Sustainable Urban Extension (SUE) (identified on the draft Policy Map - Shrewsbury Inset) on the viability of Oxon Hall caravan park.
A0123	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	No	No	Yes	Support the principles in draft Policy SP1. However imperative they are robustly applied in the decision making process (including in relation to the Shrewsbury Sustainable Urban Extension (SUE) West and the North West Relief Road (NWRR) to ensure that do not result in detrimental levels of air, light and noise pollution, and that the existing businesses and the wider local environment are protected). Draft Policy SP1 makes reference to the emerging Shrewsbury Big Town Plan (SBTP). However, the two documents are not consistent. For example employment land on Castle Foregate is proposed to represent protected employment land in the draft Shropshire Local Plan, but in the SBTP is proposed for offices and residential (occupiers have no desire to move and would object to proposals that would involve this). This raises concerns about soundness of the draft Shropshire Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0121	B001	The proposed allocation of the green belt site ALV009 for future housing development in the Local Plan period should be removed. Shropshire Council should remove paragraph 7 of S3.2 from the Local Plan. This refers to an area of land beyond the Alveley development boundary and states that this is being safeguarded to meet future development need beyond the period of the this Plan. For the reasons stated above, no such safeguarding is required.	Noted. Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable and deliverable. The Draft Plan strategy has focused development in principal and key centres, but Green Belt release, to provide for allocations, are identified for Alveley to support its continuing role as a Community Hub as detailed within the exceptional circumstances statement. Allocation of sites in different parts of the village provides alternative delivery options. Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. Existing commitments and development in Alveley during the Plan period (2016-2038) are taken into account and contribute to the housing guideline figure. The exceptional circumstances statement details potential compensatory improvements to the Green Belt, including opportunities to for improving access. In accordance with national policy safeguarded land is identified to meet needs beyond the current Plan period.	No
A0122	B001	The "Hierarchy of Settlements has to be changed. It has to take proper account of the council's Spatial Vision SP3 Climate Change and Sustainability Objectives SO5, 6, & 12. That is to reduce carbon emissions by reducing car travel and encourage other sustainable journeys. To do this the wording in Para 5.41 "In circumstances where there is no regular public transport service; and/or high speed broadband; and/or multiple significant employment opportunities, a larger range of services and facilities would be necessary to enable a settlement to achieve the specified point's threshold" and "peak time public transport" for "Hub status" in Para 1.16 Table 2 and Para 5.35 Table 6. This list of settlements will have to be reviewed with the updated requirements. This will then require the Draft Plan settlement status and allocations changed.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.	No
A0122	B002	Trefonen should be regarded as a "Rural Settlement" with housing development to meet the needs of local people over the plan period. This can be achieved by "Affordable Exception" and "Rural Exception" as a housing policy set out in the Draft Plan for rural settlements with a school, This would include many type of housing such as houses, bungalows starter homes. This could be achieved with small developments of say 5 homes. Also consideration should be given to the extensive work performed by the community to produce the Village Design Statement. This should be referred to in the SP5 High Quality Design.	Shropshire Council undertook a robust assessment during the Hierarchy of Settlement process and Trefonen's services and facilities meant that its score resulted in it being a Hub. Notably there are no housing allocations in the settlement as part of this Plan Review. Community Led Plans are considered to be appropriately referenced within the proposed explanation of draft Policy SP5 and other draft policies/proposed explanations to draft policies. Village Design Statements are considered a form of community-led plan. However, for clarity a minor modification is proposed to the explanation to draft Policy SP5.	Yes
A0123	B001	Need to carefully consider protection of the local environment and ensure policies are prepared to ensure that development proposals will not result in detrimental impacts on adjacent land uses and the long term viability of Oxon Hall caravan park.	Noted. The draft Shropshire Local Plan should be read as a whole. It includes draft Policies relating to the natural and historic environment. All proposed allocations have been subject to a proportionate and robust site assessment process.	No
A0123	B002	Make amendments to the draft policies to secure greater protection of Oxon Hall caravan park and the amenities of the wider population from inappropriate development.	Noted. The draft Spatial Vision would be implemented through the draft Policies proposed within the draft Shropshire Local Plan. These drat Policies are considered to provide an appropriate framework for managing future development proposals.	No
A0123	B003	Undertake dialogue regarding concerns about the North West Relief Road and applications within the Shrewsbury West Sustainable Urban Extension (SUE).	Noted. Significant engagement has occurred in relation to the proposed North West Relief Road (NWRR). The scheme is now the subject of a Planning Application to which consultation responses can be submitted. Any Planning Application on the existing allocation Shrewsbury West SUE would also be subject to consultation.	No
A0123	B004	Ensure the Shrewsbury Big Town Plan is consistent with the draft Shropshire Local Plan or remove reference to it.	Shropshire Council considers that draft Policy SP1 and the objectives of the Big Town Plan and its associated masterplan documents are consistent. We would note that the draft Shropshire Local Plan, if adopted, would represent the starting point for decision making in accordance with Planning law, but that the specific proposals within or resulting from the Big Town Plan would be material in decision making.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0123	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	No	No	Yes	Draft Policy SP2 identifies Shrewsbury as the key strategic centre of Shropshire. Do not object to this, however, development proposals/allocations on the edge of the settlement must not result in severance between the town centre and wider local area. For example safe and suitable pedestrian access must be maintained between Oxon Hall caravan park and Shrewsbury Town Centre (over the North West Relief Road and through the Shrewsbury Sustainable Urban Extension (SUE) West), so visitors can continue to support the local economy. For the same reason, bus routes should also be maintained. Consider tourist related development outside development boundaries should be supported within draft Policy SP2 given their importance to rural economies and jobs, particularly in Shropshire. Note draft Policy SP2 includes reference to supporting delivery of the Shrewsbury Big Town Plan (SBTP). However, the SBTP is at an early stage, has not been subject to consultation and the two documents are not consistent. This raises concerns about soundness of the draft Shropshire Local Plan.
A0123	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	No	No	Yes	Imperative safe and suitable pedestrian access is maintained between Oxon Hall caravan park and Shrewsbury Town Centre (over the North West Relief Road and through the Shrewsbury Sustainable Urban Extension (SUE) West), to enhance visitor experience, promote visitor spend in the town centre and have a positive impact on climate change. This appears to be supported in the draft Shropshire Local Plan, which is welcomed and look forward to their application in relation to the above development proposals.
A0123	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	No	No	Yes	Welcome support for tourist related developments within the countryside in draft Policy SP10. However, consider further clarification is required in relation to para 3b. Question whether draft Policy SP10 goes far enough and whether it will be fit for purpose in a post-Covid 19 world where staycations are likely to become more common place and demand for accommodation and tourist uses is likely to be heightened. Accept suitable safeguards need to be in place to protect amenity and the environment, but the draft Policy as worded is not sufficiently flexible to meet the needs of businesses and support their long-term future.
A0123	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	No	No	Yes	Support aspirations to support economic growth and development and the provisions and principles of the draft Policy SP12. Note amendments responding to comments on the economic fallout from the global health crisis, and the need to ensure that the Development Plan meets the needs of businesses in this new era and is sufficiently positive and proactive in supporting growth, development and business investment to secure the long term future of the local economy and existing jobs and businesses. It is however important that other policies in the draft Shropshire Local Plan are consistent with this approach.
A0123	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	No	No	Yes	Support aspirations to support jobs, existing businesses and economic growth. Ask that the relevant draft policies contained in the draft Shropshire Local Plan are suitably flexible to allow businesses to respond to changing circumstances. In light of the impact on working patterns and the economy of the coronavirus pandemic this issue cannot be ignored.
A0123	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	No	No	Yes	Draft Policy SP14 appears to indicate creation of development corridors along infrastructure routes. Whilst it is understandable to focus developments in areas which are accessible and well connected, concerned this could lead to additional development in and around Oxon Hall Caravan Park, which already faces significant disturbance associated with the Shrewsbury Sustainable Urban Extension (SUE) West and potentially the North West Relief Road (NWRR) and flood alleviation schemes. Would not like to see further development which could undermine its viability (noise, dust, pollution and disturbance created both during construction and operation could discourage visitors). Would object to any proposals for a strategic corridor in the vicinity of Oxon Hall, and there are no safeguards that such developments will not be forthcoming.
A0123	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP10	No	No	Yes	Welcome support for the growth and expansion of new and existing tourist related developments within Shropshire in draft Policy DP10. However, para 8 of draft Policy DP10 includes reference to applications for static caravans, chalets and log cabins being of appropriate scale and capacity, but no indication of what that means is provided. This lack of clarity will raise concern for operators and business owners as to whether applications to grow their enterprise could be inhibited.
A0123	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18	No	No	Yes	Support provisions of draft Policy DP18, and they are addressed and implemented in relation to the assessment of the current planning application relating to the Shrewsbury Sustainable Urban Extension (SUE) West and the upcoming application on the NWRR. Both applications raise significant concerns in relation to impact on the environment including air, water, light and noise pollution and impact on the protected species and given current and draft policies expect sufficient documentation on these matters to support these applications and suitable safeguard secured.
A0123	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP19	No	No	Yes	Note draft Policy DP19 seeks to protect the water environment and secure appropriate drainage. Trust necessary assessments and mitigations will be put in place in line with the provisions of the draft policy when reviewing the proposals associated with the Shrewsbury Sustainable Urban Extension (SUE) West and NWRR, to ensure that there will be no detrimental impacts on water storage capacity, water quality and the drainage requirements to protect adjacent land owners from surface water flooding.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0123	B005	Ensure developments/allocations on the edge of settlements do not result in severance between the town centre and wider local area. Amend draft Policy SP2 to support tourism development outside development boundaries. Note draft Policy SP2 includes reference to supporting delivery of the Shrewsbury Big Town Plan (SBTP). However, the SBTP Remove reference to supporting delivery of the Shrewsbury Big Town Plan.	Noted. The draft Shropshire Local Plan should be read as a whole. Shropshire Council considers that the draft Shropshire Local Plan includes an appropriate draft strategy and draft policies relating to tourism and pedestrian/cyclist connectivity. Shrewsbury Big Town Plan is a visionary urban design document which has established a compelling and challenging shared vision and development framework for the town. It is considered appropriate to identify the objectives of the Big Town Plan and its associated masterplan documents as material considerations in decision making as they underpin the proposed strategy for Shrewsbury. We would note that the draft Shropshire Local Plan, if adopted, would represent the starting point for decision making in accordance with Planning law, but that the specific proposals within or resulting from the Big Town Plan would be material in decision making.	No
A0123	B006	N/A	Noted.	No
A0123	B007	Provide further clarification of para 3b of draft Policy SP10.	Noted. The draft Shropshire Local Plan is intended to be read as a whole and draft Policy DP10 provides the detailed policy context in respect of tourism, cultural and leisure related development. Draft Policy SP10 more broadly addresses how sustainable rural development can be achieved within the context of the Draft Plan's overall strategic approach in Draft Policy SP2. When considering development proposals, the need to support rural vitality and the viability of countryside as an economic, as well as an environmental, resource will be a significant consideration. Draft SP2 recognises the countryside as a 'living-working' environment and provides for appropriate development to facilitate its various functions and support the sustainability of rural communities. Shropshire Council therefore considers that the draft Shropshire Local Plan includes an appropriate draft strategy and draft policies relating to tourism development.	No
A0123	B008	Ensure draft Policies in the Shropshire Local Plan are consistent with draft Policy SP12 and sufficiently positive and proactive in supporting growth, development and business investment.	Noted. Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent and positively contribute to the achievement of this strategy.	No
A0123	B009	Ensure draft policies relating to economic development are sufficiently flexible to allow businesses to respond to changing circumstances	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic.	No
A0123	B010	Provide safeguards that a strategic corridor will not be identified near Oxon Hall caravan site.	SP14 defines a strategic corridor along the A5 by-pass to the south and west of Shrewsbury. This places a 'strategic corridor' to the west of the Oxon Hall caravan park. It is expected that development associated with a strategic corridor should be closely located and have ready access to the corridor. In relation to the Oxon Hall caravan park, this site is already closely bounded by the existing Western Sustainable Urban Extension where the proposed Oxon Link Road is intended to link the proposed North West Relief Road to the existing A5. These current land allocations and proposed highway infrastructure projects should serve to protect the Oxon Hall caravan park from any further development proposals around the caravan site.	No
A0123	B011	Provide an explanation of para 8 of draft Policy DP10.	An "appropriate scale and capacity" would be relevant on a case-by-case basis, as there may be sites of much larger caravans or log cabins etc and others with smaller ones, or sites with numerous caravans or log cabins and other sites with very few. Therefore such a matter would be dealt with at the planning application stage	No
A0123	B012	N/A	Noted.	No
A0123	B013	N/A	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0123	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP21	No	No	Yes	Accept flood risk management proposed in Shropshire are evolving, and the recent proposals relating to the potential for flood alleviation schemes as part of the North West Relief Road (NWRR) have been published following the publication of this consultation. Assume these matters will be presented for consultation in future and relevant stakeholders potentially affected will be contacted directly by the Council. Concerned that flood alleviation proposals created as part of the NWRR do not risk the future operation/increase potential flood risk at Oxon Hall caravan park.
A0123	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16	No	No	Yes	Note draft Policy S16 makes reference to the proposed alignment of the North West Relief Road (NWRR) and the Council's support in principle for this new highway. Have significant concerns about the impact of the NWRR on the future viability of Oxon Hall Caravan Park. Have particular concerns about para 7 of draft Policy S16, specifically proposed support for potential commercial uses along the NWRR corridor and would not support proposals which increase the extent of development in proximity of Oxon Hall Caravan Park over and above that previously approved and particularly any uses which would create noise and disturbance to Oxon Hall visitors. Note reference to applications on the Shrewsbury Sustainable Urban Extension (SUE) West reflecting the previously approved Masterplan. Request the Council implement the provisions in determination of the current planning application which cannot be deemed in compliance and should be refused. Note draft Policy S16 includes reference to supporting delivery of the Shrewsbury Big Town Plan (SBTP). However, the SBTP is at an early stage, has not been subject to consultation as such this could be premature. Alternatively it could imply current consultation on the SBTP is limited and decisions already made. Would not disagree or resist appropriate improvements to the town centre but concerned the SBTP proposes office and residential uses on sites on Castle Foregate, this site is not deliverable as the current occupier has no intention of leaving.
A0123	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	No	No	Yes	Statistics underpinning the draft Shropshire Local Plan are pre-Covid 19 and assumptions underpinning it need to be re-evaluated. Concerned the draft Shropshire Local Plan as drafted is not fit for purpose. Furthermore, it ignores feedback from earlier consultations.
A0124	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP14	Yes	Yes	Yes	It is not clear whether this policy is intended to provide a criteria based policy for the protection of playing fields. Parts of the policy elude to this and para 4.138 expressly states that GI includes playing fields. However, if this is the case, the policy wording is not consistent with NPPF para 97.
A0124	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP15	Yes	Yes	Yes	Support the modifications made at Reg 18 to parts 2 and 7 of the policy and to paragraphs 4.148 - 4.151 of the explanation.
A0124	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18	Yes	Yes	Yes	Support the modifications made at Reg 18 to part 10g of the policy and to paragraph 4.174.
A0124	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S19: Clive Barracks	Yes	No	Yes	1.Site includes an existing area of playing field laid out to provide two pitches. The PPOSS recommends that playing pitches are protected and re-used to meet the needs of development. Clive Barracks development generates a need for 1.89 pitches and 2.52 changing rooms, so these existing pitches would be sufficient. However, this is not reflected in the site guidelines. 2. The site could also accommodate one of the sports clubs which would be displaced if the Greenfields site in Market Drayton is developed for housing or it could meet other team's demand in the area.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0123	B014	Consult/liaise with relevant stakeholders on proposals regarding flood risk management schemes.	Noted. This goes beyond the scope of the draft Shropshire Local Plan.	No
A0123	B015	Revise the wording of para 7 of draft Policy S16 to respond to concerns about development in proximity to Oxon Hall caravan park. Remove reference to supporting delivery of the Shrewsbury Big Town Plan.	Noted. The proposed strategy for Shrewsbury to 2038 is considered to provide a robust, justified and effective strategy for the town and it is appropriate for the strategy to reflect upon and acknowledge wider Council priorities, including the delivery of the NWRR and the Big Town Plan. No change suggested.	No
A0123	B016	Update statistics underpinning the draft Shropshire Local Plan to reflect the impact of Covid 19. Respond to previous consultation responses.	Noted. Shropshire Council considers that a proportionate and robust evidence base has been assembled to inform the draft Shropshire Local Plan. Shropshire Council also considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.	No
A0124	B001	Amend para 4.138 lines 5-6 to clarify that Policy DP14 is not intended to apply to playing fields. Clarify that Policy DP15 should be applied in respect of playing fields.	A minor modification to paragraph 4.138 to clarify that playing fields are covered by Policy DP15 is proposed	Yes
A0124	B002	n/a	Support welcomed	No
A0124	B003	n/a	Support welcomed	No
A0124	B004	Amend site guidelines to include additional text as follows or similar: The development shall retain the existing playing field (or re-provide an area of playing field that is equitable in quantity and quality elsewhere within the site). This shall include the provision of new playing pitches, ancillary changing rooms and car parking provision to meet the needs of the proposed development in accordance with the Council's adopted Playing Pitch and Outdoor Sports Strategy (PPOSS). The developer will be expected to ensure that the facilities are provided to an appropriate standard in accordance with Sport England guidance, and make appropriate provision for their subsequent management and maintenance thereafter.	For the sake of clarity, it is proposed that a minor modification to Policy S19 paragraph d) is made.	Yes

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0124	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S20 Ironbridge	Yes	Yes	Yes	1. Support the modification to part h) of the policy at Reg 18. 2. It is recommended that the wording of the policy is expanded to require the proposed development to retain the existing playing fields for the provision of three new playing pitches, associated pavilion and car parking facilities, and that the development will be expected to secure the future management and maintenance of the pitches and associated facilities.
A0124	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Yes	Yes	Yes	Support the modifications made to the policy at Reg 18 to make specific reference to supporting active and healthy lifestyles and supports the corresponding modification to paragraph 3.34 to reference promoting healthy and safe communities.
A0124	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Yes	Yes	Yes	1. Support the modifications made to the policy and para 3.45 at Reg 18. 2. There is concern that the words "wherever possible" have been added in relation to ensuring new development is within walking distance of open space, since this implies that new developments may be permitted in locations that are not within accessible walking distance, contrary to the purpose of the policy to promote health and well-being. 3. There is an opportunity to cross reference to policy DP16.
A0124	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Yes	Yes	Yes	Support the modifications made to part 8 of the policy at Reg 18.
A0124	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	ALV006 & ALV007	Yes	Yes	Yes	Support the modifications made at Reg 18.
A0124	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	BOM020	Yes	No	Yes	The proposed allocation adjoins an existing playing field, previously laid out as a football pitch. This pitch has now been leased to the cricket club to the south (and adjacent) with a view to developing a 2nd cricket pitch. The location of the proposed housing allocation gives rise to concerns that the development may prejudice the use of the playing field due to the proximity of the playing field to the proposed housing site, and the associated risk of ball strike. From experience, Sport England is aware that club cricketers are capable of striking a cricket ball in the region of 70-80 metres, which would potentially put the proposed development at risk of ball strike, since the cricket pitch would be likely to be in the region of 45 metres from the site boundary.
A0124	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	BRD030	Yes	Yes	Yes	Support the modification to require the provision of new playing fields and associated facilities within the site guidelines, made at Reg 18. However, the need is likely to be met by a combination of on- and off- site provision so we would like to see this referenced in the guidelines also. Additionally, we would like the guidelines to state that developers will be expected to demonstrate how the provision of new pitches and associated facilities will be managed and maintained.
A0124	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	MDR039 & MDR043	Yes	No	Yes	1. These comments should be read alongside ours on S11.1 Market Drayton. If the relocation of the Greenfields Sports Hub is not financially viable in its own right, then developer contributions from MDR039 & MDR043 should be considered to assist this. 2. Support the allocation of this site and the reference to providing pedestrian cycle and vehicular access to the relocated sports hub site via this housing development.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0124	B005	Include additional text as follows or similar: The development shall retain the existing playing field (or re-provide an area of playing field that is equitable in quantity and quality elsewhere within the site). This shall include the provision of new playing pitches, ancillary changing rooms and car parking provision to meet the needs of the proposed development in accordance with the Council's adopted Playing Pitch and Outdoor Sports Strategy (PPOSS). The developer will be expected to ensure that the facilities are provided to an appropriate standard in accordance with Sport England guidance, and make appropriate provision for their subsequent management and maintenance thereafter.	For the sake of clarity, it is proposed that a minor modification to Policy S20, paragraph d) is made.	Yes
A0124	B006	n/a	Support welcomed.	No
A0124	B007	n/a	1. Support welcomed. 2. The Council considers that the SP6 paragraph 7 is appropriate as it would be unreasonable to require all development to be located within walking distance of open space. 3. The Plan should be read as a whole. The Council does not consider a cross reference to policy DP16 to be necessary	No
A0124	B008	n/a	Support welcomed.	No
A0124	B009	n/a	Support welcomed.	No
A0124	B010	Site guidelines be amended to include the following: The developer should undertake a ball strike assessment to assess the risk of ball strike from the use of the adjoining playing field to the south of the site. The assessment should be submitted with any planning application to develop the site. Subject to the recommendations of this assessment, where any mitigation is deemed to be required in the form of ball catch fencing or similar that such works will be required to be undertaken and subsequently maintained in perpetuity by the developer.	For the sake of clarity, it is proposed that a minor modification is made to the 5 <sup>th</sup> paragraph of the guidelines for site BOM020.	Yes
A0124	B011	Expand the wording of the developer guidelines to set out that the need for playing fields will be met through a combination of on-site provision and off-site contributions, and that developers will be expected to make appropriate provision for the management and maintenance of on-site playing field provision.	For the sake of clarity, it is proposed that a minor modification is made to the 13 <sup>th</sup> paragraph of the guidelines for site BRD030.	Yes
A0124	B012	Address the issue of viability of the proposed sports hub relocation to ensure consistency with the advice in the NPPF regarding deliverable planning policies, and if necessary require the proposed housing allocation to contribute towards the cost of relocating the sports hub.	The relocation of the Market Drayton sports facilities, currently located at Greenfields (on land owned by Shropshire Council), is a major local priority, having been considered as part of the draft Market Drayton Neighbourhood Plan. The Council is seeking to plan positively for this delivery and in doing so continue to assess the overall viability of the relocation of the current sports facilities at Greenfields, which includes an assessment of likely relocation costs, against an assessment of the likely re-use of the current site for alternative uses. This is recognised in paragraph 5.154 of the draft Local Plan. It is currently considered that the proposed relocation remains a viable proposition and is supported locally by the Town Council. The proposed housing scheme at Longford Turning (MDR039/MDR043) is required to enable sufficient improvements to the pedestrian, cycle and vehicle accessibility into the proposed relocation site (identified as a broad location on the draft Policies Map). In addition, there is the potential for CIL funding to support the wider improvements necessary and which could be used as 'gap' funding.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0124	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1	Yes	No	Yes	<p>1. Note the Reg 18 modification to part 3 of policy but request additional text to ensure replacement facilities are equitable in quantity and quality in a suitable location.</p> <p>2. Our concerns relate to the apparent uncertainty regarding viability of the relocation of the Greenfield Sports Hub. The Plan does not demonstrate the relocation is deliverable in line with the guidance in the NPPF. The uncertainty regarding deliverability potentially undermines continued use and investment in the existing Sports Club site who may find it difficult to secure grant funding due to the uncertainty regarding potential future relocation.</p> <p>3. The policy map only identifies a broad location for proposed relocation to Longford Turning. This is insufficiently precise to demonstrate that the relocation of the sport facilities will provide equitable provision in quantity in accordance with para 97 of the NPPF. To address this, a specific site should be allocated for sports development, identifying the overall area (i.e.. square metres) of land to be provided to demonstrate that this allocation would be equitable in quantity (i.e.. area) to re-provide the existing pitches, courts, and ancillary facilities at Greenfields. Consideration should also be given to allocating additional land to facilitate future growth of the sports hub. This This should be supported by a feasibility assessment to demonstrate that the land is capable of providing the replacement sports pitches and associated facilities, taking into account any technical constraints such as levels, soil profiles, drainage etc.</p>
A0124	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SHR057 & SHR177	Yes	Yes	Yes	Support the modifications made at the Reg 18 stage. Site guidelines should additionally state that developers will be expected to demonstrate how the provision of any new on-site facilities will be managed and maintained.
A0124	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SHR060,158 & 161	Yes	No	Yes	The development guidelines for two other major housing allocations in Shrewsbury (SHR057 & SHR177 and SHR173) were modified to include requirements for playing field provision at Reg 18 ( a modification which Sport England supports) so it is unclear why the Council have not included the same provision for playing fields within the development guidelines for this site.
A0124	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SHR173	Yes	Yes	Yes	Support the modifications made at the Reg 18 stage. Site guidelines should additionally state that developers will be expected to demonstrate how the provision of any new on-site facilities will be managed and maintained.
A0124	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SMH038	Yes	Yes	Yes	Support the modifications made at Reg 18 stage.
A0125	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 STC002/P58a Policy Map 3	Not Specified	No	Not Specified	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth.</p> <p>Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0125	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 and STC002/P58a	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0124	B013	<p>1. Revise the policy wording to ensure that the replacement sports hub at Longford Turning is to be equitable in quantity and quality to accord with para 97 of the NPPF, and to accord with proposed policy DP15 (open space and recreation).</p> <p>2. Address the issue of viability to relocate the existing sports hub from Greenfields to Longford Turning in line with the guidance in the NPPF, and revise the wording of part 3 of the policy accordingly, or alternatively remove the allocation from the Plan if viability of the relocation cannot be demonstrated.</p> <p>3. Revise the proposals map to specifically allocate sufficient land for the proposed sports hub relocation (rather than the current less precise proposal to show a broad location for relocation), supported by feasibility assessment that demonstrates the replacement land to be equitable in quantity in accordance with para 97 of the NPPF.</p>	<p>It is considered the current draft policy in S11.1(3), which specifies "that the relocation of Market Drayton Sports facilities from its current site on Greenfields Lane to land at Longford Turning, identified on the Policies Map, to enable the delivery of new facilities to at least equitable standard" provides sufficient certainty regarding the proposed location and quality of the new facility. Furthermore, the draft Shropshire Local Plan should be read as a whole, draft Policy DP15 would apply to any proposals for relation of the Market Drayton Sports facilities.</p>	No
A0124	B014	n/a	<p>For the sake of clarity, it is proposed that a minor modification is made to the 6th paragraph of the guidelines for site SHR057 &amp; SHR177.</p>	Yes
A0124	B015	<p>Modify the proposed development guidelines to include the following text or similar: On site provision and off site developer contributions are to be made for additional playing field provision and associated ancillary facilities for changing and car parking in line with the Council's Playing Pitch and Outdoor Sports Strategy (PPOSS). Developers will be expected to demonstrate that any new on-site provision will be provided to an appropriate standard in accordance with Sport England guidance, and will be required to put in place appropriate arrangements for management and maintenance of the playing field thereafter.</p>	<p>For the sake of consistency and clarity, it is proposed that a minor modification is made to insert a new paragraph into the guidelines for site SHR060, 158 &amp; 161.</p>	Yes
A0124	B016	n/a	<p>For the sake of clarity, it is proposed that a minor modification is made to the 9th paragraph of the guidelines for site SHR057 &amp; SHR177</p>	Yes
A0124	B017	n/a	<p>Support welcomed.</p>	No
A0125	B001	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.</p>	<p>Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.</p>	No
A0125	B002	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.</p>	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0125	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 and STC002/P58a	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0125	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 and STC002/P58a	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0126	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Not Specified	No	Not Specified	Consultation during Pandemic is inadequate & does not allow for full response. No scope for public meetings and limited opportunity for word of mouth dissemination due to social distancing & other restrictions. Difficult to respond to the consultation: is not easily found/recognisable as the appropriate consultation on the Council's website; making a response is not website/computer friendly, users are expected to print or download the forms, save them, add comments and attach to an email for return.
A0126	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2(i) WBR 007-008 Worthen and Brockton Policies Map	Not Specified	No	Not Specified	WBR 007 and 008 both scored POOR in the SA & notes that the site not within walking distance of services and facilities. A Transport Assessment should be carried out to determine appropriate measures for improving safe pedestrian and cycle access to local services and amenities, including provision of an attractive pedestrian route through the Site with the Public Right of Way retained. Vehicular access will be provided onto the B4386 with appropriate traffic calming measures, including extension of the 30mph limit. This Parish Council however has already advised that the proposed route is not safe with exit onto mainly single track lane itself exiting onto busy and fast B4386 with poor visibility to enable safe crossing. Speeding is a community concern and the village is part of the PACT priority for the local policing team. The village 30 mph limit is not adhered to with speed increasing near Worthen Hall Farm. In order to access a range of services new residents would require a car resulting in additional traffic/speeding on, poor rural roads. On the 20th January 2021 ( for the 3rd time since October 2019) the road along site WBR007/008 was flooded and impassable by car. Additional concerns that the size of the Land has a greater capacity ( at least 35) for development than the 25 indicated in the pre-submission draft and in light of Government White Paper would automatically be granted outline planning permission on Plan adoption. Plan proposal of 55 would mean housing stock/size of the village would be increased by 38%, rising alarmingly to 61% if all sites developed to their full potential. This site could accommodate at least 35 dwellings.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0125	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0125	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0126	B001	not specified	Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation. Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan. It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.	No
A0126	B002	WBR 070/080 was rated poor and site WBR 010 did not have a full appraisal as it was not considered initially	All the proposed site allocations in Worthen have been informed by a proportionate and robust site assessment process, which included considerations of highways impact and flood risk. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0126	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2(i)WBR 010 Worthen and Brockton Policies Map	Not Specified	No	Not Specified	WBR010 scored Good in SA but there is no safe pedestrian access to this site/adjoining road and the available footpath on the other side of the road are not regulation width. Speeding combined with poor visibility requires consideration of safe accessibility of residents to village services & a private vehicle would be required to access services in closest towns Shrewsbury or Welshpool. Site WBR010 was refused at appeal in 2004 due to its impacts ( decision details included) which concluded that there would be urbanisation of countryside which would be harmful to its intrinsic character and beauty.... with harm would be caused to the attractive landscape setting of the village Whilst suggested that this site has "capacity" to provide 20 new dwellings, in reality it could up to 50 dwellings under the a more relaxed development regime outlined in the recent White Paper.
A0126	B004	Sustainability Appraisal	S2 Bishops Castle Place Plan Area WBR007/008/010	Not Specified	No	Not Specified	WBR 007 and 008 both scored POOR in the SA & notes that the site not within walking distance of services and facilities. A Transport Assessment should be carried out to determine appropriate measures for improving safe pedestrian and cycle access to local services and amenities, including provision of an attractive pedestrian route through the Site with the Public Right of Way retained. Vehicular access will be provided onto the B4386 with appropriate traffic calming measures, including extension of the 30mph limit. This Parish Council however has already advised that the proposed route is not safe with exit onto mainly single track lane itself exiting onto busy and fast B4386 with poor visibility to enable safe crossing. Speeding is a community concern and the village is part of the PACT priority for the local policing team. The village 30 mph limit is not adhered to with speed increasing near Worthen Hall Farm. In order to access a range of services new residents would require a car resulting in additional traffic/speeding on, poor rural roads. On the 20th January 2021 ( for the 3rd time since October 2019) the road along site WBR007/008 was flooded and impassable by car. WBR010 scored Good in SA but there is no safe pedestrian access to this site/adjoining road and the available footpath on the other side of the road are not regulation width. Speeding combined with poor visibility requires consideration of safe accessibility of residents to village services & a private vehicle would be required to access services in closest towns Shrewsbury or Welshpool. Additional flooding, sewerage, uplift in road use must be a consideration when considering this inclusion of these two sites.
A0126	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2(i)WBR007/008 /010	Not Specified	No	Not Specified	Hierarchy of settlements points scoring is flawed. A one size fits all scoring system used in urban and rural settings not appropriate. Following consultation events carried across the parish, regarding the future settlement status overwhelming response & support for the parish as a whole to be returned from Cluster to countryside. A key driver for this is the volume of planning consents (as detailed in the response) across this parish in recent years with substantial over delivery of open market housing in this parish, especially executive 4 and 5 bedroomed properties which are unaffordable & do not meet local need. Properties are largely purchased by 55+ demographic moving into the location & parish in danger of losing more schools & services due to nature of housing delivery. Supportive of appropriate development but inability to guarantee delivery of 2/3 bedroom houses which have been identified as a Parish priority . The parish as whole, and Worthen and Brockton individually, have exceeded the target figures for planning consents set in SAMDev. Currently 148 dwellings in Worthen & at least 90 plus new dwellings could be delivered permanently changing the rural village character of Worthen and Brockton to an urban site. This could put pressure on services and road usage in these villages and neighbouring villages located along the B4386.Sites, WBR007, WBR008 and WBR010, when combined with windfall development of further 10 dwellings would result excessive over-development Additional flooding, sewerage, uplift in road use must be a consideration when considering this inclusion of these two sites. B4386 poorly maintained dramatic uplift in usage, type and excessive speed in recent years. Fatality experienced & safe crossing already required in Worthen and more so if additional pedestrian usage of Back Lane. Essential services are located across both Brockton and Worthen and on either side of the very fast and busy B4386. A safe pavement for Brockton to Worthen is an urgent requirement. BOAT between the villages needs to be improved for pedestrian access. Issue with cars parking outside the school due to the unsafe vehicle and pedestrian routes through the villages. People forced to drive to local services which is not environmentally friendly. Sewerage facilities are already over capacity issue with raw sewerage entering properties in Worthen. Development could exacerbate flooding in the area. Issue with road flooding restricting access to & from the village.
A0126	B006	Habitats Regulations Assessment	Shropshire Hills AONB WBR007/008/010	Not Specified	No	Not Specified	The HRA states there will be no adverse effects on the integrity of The Stiperstones and Hollies SAC as a result of the Draft Local Plan. disagree due to impact of development neighbouring the AONB. Impact on the view from the AONB vantage points and on the beauty of this natural protected environment needs to be taken into full account. The Glover Report should be a consideration. Worthen is visible from the protected vantage points within the AONB and sits just outside of AONB & it would be impacted by development within the village & its urbanisation. Site WBR010 was refused at appeal in 2004 due to its impacts (decision details included) which concluded that there would be urbanisation of countryside which would be harmful to its intrinsic character and beauty.... with harm would be caused to the attractive landscape setting of the village
A0127	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	Plan unsound because the identification of Hubs is based on the unsound Hierarchy of Settlements evidence. It is not an appropriate and robust assessment. Para 5.41 relaxation of requirement for Hubs to have both significant employment & peak time public transport will result in people living further from employment & additional unsustainable travel where no appropriate public transport available, contrary to Council's climate change policies and proposed policy SP3 Climate Change & sustainability objectives SO5, SO6 & SO12 (which seek to reduce emissions and minimise car travel ). Additionally the methodology which seeks to make an objective comparison between settlements is flawed because of the additional wording 'a larger range' of services & facilities which might mitigate the lack of transport/employment is not defined thus resulting in subjective decisions. Disagree that additional services/facilities such as play area/sports facilities or library bus can adequately compensate for lack of employment/public transport. Score to reach hub threshold



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0126	B003	WBR 070/080 was rated poor and site WBR 010 did not have a full appraisal as it was not considered initially	All the proposed site allocations in Worthen have been informed by a proportionate and robust site assessment process, which included considerations of highways impact.	No
A0126	B004	WBR 070/080 was rated poor and site WBR 010 did not have a full appraisal as it was not considered initially	All the proposed site allocations in Worthen have been informed by a proportionate and robust site assessment process, which included considerations of highways impact and flood risk. No change proposed.	No
A0126	B005	None specified	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Worthen and Brockton. Consequently, it is considered appropriate that Worthen and Brockton are identified as a proposed Community Hub. All of the proposed site allocations in Worthen have been informed by a proportionate and robust site assessment process, which included considerations of highways impact and flood risk.	No
A0126	B006	Worthen and Brockton are a Leader area to the Shropshire Hills AONB and this must be a consideration given this valued protected environment.	The Council considers the HRA of the Plan to be legally compliant and to effectively assess all likely effects of the Plan on internationally designated nature conservation sites. The proposed site allocations have been informed by a proportionate and robust site assessment process, which included consideration of impact on the Shropshire Hills AONB and Policy DP24 further safeguards the designated area.	No
A0127	B001	Hierarchy of Settlements should be amended to reflect SP1, SP3 & sustainability objectives SO5, SO6 & SO12. Para 5.41 remove the wording 'a larger range of services' to compensate for employment & public transport so that Hub requirements must include significant employment opportunities & peak time public transport. List of settlements should then be reviewed against revised criteria & settlement development status & allocations amended accordingly. On this basis Trefonen should not be a community hub & removed from schedule SP2.2:	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0127	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 - Oswestry place plan area: Trefonen Hub	Not Specified	No	Not Specified	Trefonen is the only proposed hub settlement with neither significant employment opportunities or peak time public transport. Making it a hub would be contrary to Shropshire's climate change and sustainability objectives and is unsound. Sufficient housing to meet the needs of local people during the plan period can be achieved by 'exception' mechanisms. Trefonen as a rural settlement should only have small scale housing of a type and size that reflects requirements for starter, intermediate, downsize and accessible houses or bungalows. Any development should conform to the village design statement. Important to guard against the cumulative impact of developments by additional wording within the affordable exception policies DP4,5,6 and 7.
A0127	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 - Oswestry place plan area: Trefonen Hub	Not Specified	No	Not Specified	Important to guard against the cumulative impact of developments
A0127	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 - Oswestry place plan area: Trefonen Hub	Not Specified	No	Not Specified	Important to guard against the cumulative impact of developments
A0127	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 - Oswestry place plan area: Trefonen Hub	Not Specified	No	Not Specified	Important to guard against the cumulative impact of developments
A0127	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Trefonen	Not Specified	No	Not Specified	Important to guard against the cumulative impact of developments

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0127	B002	Trefonen is the only proposed hub settlement with neither significant employment opportunities or peak time public transport. Making it a hub would be contrary to Shropshire's climate change and sustainability objectives and is unsound. Sufficient housing to meet the needs of local people during the plan period can be achieved by 'exception' mechanisms. Trefonen as a rural settlement should only have small scale housing of a type and size that reflects requirements for starter, intermediate, downsize and accessible houses or bungalows & conforms to the village design statement. Important to guard against the cumulative impact of developments by the additional wording within the affordable exception policies DP4,5,6 and 7.	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment. As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub. Shropshire Council also considers that the development strategy proposed for Trefonen, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable. It is noted that the proposed requirements in draft Policy S14.2, which applies to the proposed Community Hubs in the Oswestry Place Plan Area - including Trefonen, includes "development proposals will be expected to positively respond to policies and guidelines within any relevant community-led plans and local needs."	No
A0127	B003	guard against the cumulative impact of developments by the additional wording within the affordable exception policies DP4,5,6 and 7.	All Local Plan policy requirements which are relevant are taken into account in the consideration of development proposals. Policy SP7 'Managing housing development' requires consideration be given to cumulative impacts for settlements identified in Policies S1-S20. Where development facilitated by Policy DP4 relates to a Community Hub or Community Cluster all aspects of these Policies, including the cumulative consideration of development set out in SP8 (part g) for Community Hubs & SP9 ( part f) for Community Clusters is relevant. Residential development outside identified settlements, in the countryside, is strictly controlled in accordance with Policy SP10 which further requires that development proposals do not lead to an adverse cumulative impact on the character of communities.	No
A0127	B004	guard against the cumulative impact of developments by the additional wording within the affordable exception policies DP4,5,6 and 7.	All Local Plan policy requirements which are relevant are taken into account in the consideration of development proposals. Policy SP7 'Managing housing development' requires consideration be given to cumulative impacts for settlements identified in Policies S1-S20. Where development facilitated by Policy DP5 relates to a Community Hub or Community Cluster all aspects of these Policies, including the cumulative consideration of development set out in SP8 (part g) for Community Hubs & SP9 ( part f) for Community Clusters is relevant. Residential development outside identified settlements, in the countryside, is strictly controlled in accordance with Policy SP10 which further requires that development proposals do not lead to an adverse cumulative impact on the character of communities.	No
A0127	B005	guard against the cumulative impact of developments by the additional wording within the affordable exception policies DP4,5,6 and 7.	All Local Plan policy requirements which are relevant are taken into account in the consideration of development proposals. Policy SP7 'Managing housing development' requires consideration be given to cumulative impacts for settlements identified in Policies S1-S20. Where development facilitated by Policy DP6 relates to a Community Hub or Community Cluster all aspects of these Policies, including the cumulative consideration of development set out in SP8 (part g) for Community Hubs & SP9 ( part f) for Community Clusters is relevant. Residential development outside identified settlements, in the countryside, is strictly controlled in accordance with Policy SP10 which further requires that development proposals do not lead to an adverse cumulative impact on the character of communities.	No
A0127	B006	guard against the cumulative impact of developments by the additional wording within the affordable exception policies DP4, 5, 6 and 7.	All Local Plan policy requirements which are relevant are taken into account in the consideration of development proposals. Policy SP7 'Managing housing development' requires consideration be given to cumulative impacts for settlements identified in Policies S1-S20. Where development facilitated by Policy DP7 relates to a Community Hub or Community Cluster all aspects of these Policies, including the cumulative consideration of development set out in SP8 (part g) for Community Hubs & SP9 ( part f) for Community Clusters is relevant. Residential development outside identified settlements, in the countryside, is strictly controlled in accordance with Policy SP10 which further requires that development proposals do not lead to an adverse cumulative impact on the character of communities.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0128	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17 .2 - Clive	Not Specified	No	Not Specified	<p>Policy S17 is based on inaccurate and out of date evidence on settlement sustainability The Village Store and bowling green amenities included within Hierarchy of Settlements assessment score no longer exist. This is evidenced by various correspondence &amp; communications, meeting minutes, planning applications, Playing Pitch and Outdoor Sports Strategy (Oct 2020) from May 2018 on ( full details submitted with response). Evidence has been submitted that the shop is unviable and closure permanent ( with a change of use application) and that change of ownership had taken place causing loss of bowling green. Taking into account these changes to available facilities the correct assessment score for Clive should be 47 points which falls below the threshold for Community Hub designation. Inclusion of Clive as a Hub is therefore not justified. Additionally, the Playing Pitch and Outdoor Sports Strategy evidence does not identify any need for or shortfall in bowling provision. Therefore, demand and value of a bowling green and justification for including in Clive's Hierarchy of Settlements services and amenities points score are also not justified or sound.</p> <p>Approach to inconsistent in Shropshire, with respect to considering changes in amenities and services and subsequent reassessment against the Hierarch of Settlements methodology e.g. approach in Clive compared to Myddle &amp; Westbury Hub re-assessments &amp; reclassification following notification of loss of services/facilities in these settlements. Clive's settlement designation has been repeatedly and unnecessarily deferred. Evidence required to confirm loss of services has been more onerous than elsewhere &amp; extensive evidence of loss of services in Clive has not been acted on resulting in inclusion as a Hub at Regulation 19 and the need for consideration of settlement status a main modification. Negative impact of this is that if Hub status removed by the Planning Inspector, default would be countryside status and option of Community Cluster, which may have been supported by the community is not now available without lengthy and expensive Neighbourhood Plan process. Inconsistent application of the Hierarchy of Settlements methodology with regard to Clive also raises serious questions over the soundness of the Local Plan.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0128	B001	Clive settlement should be not be designated a Hub & references to Hub status should be removed from the Plan.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0128	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>SP2 is intended to be informed by a consistent methodology of assessing settlements and for identifying Community Hubs, as set out in the Hierarchy of Settlements document. The purpose of the evidence of the Hierarchy of Settlement is to inform the Plan through assessment of the sustainability of settlements and their ability to support additional housing. However, the application of Policy SP2 in the identification of Community Hubs is not based on up to date, accurate, or appropriate evidence and consideration. Review of updated evidence regarding services and facilities has not satisfactorily implemented in the case of Clive. Its deferral of matters relating specifically to the settlement designation means the Plan is not effective.</p> <p>Clive hub status is based on inaccurate and out of date evidence on settlement sustainability The Village Store and bowling green amenities included within Hierarchy of Settlements assessment score no longer exist. This is evidenced by various correspondence &amp; communications, meeting minutes, planning applications, Playing Pitch and Outdoor Sports Strategy (Oct 2020) from May 2018 on (submitted with response). Evidence has been submitted that the shop is unviable and closure permanent (with a change of use application) and that change of ownership had taken place causing loss of bowling green. Taking into account these changes to available facilities the correct assessment score for Clive should be 47 points which falls below the threshold for Community Hub designation. Inclusion of Clive as a Hub is therefore not justified. Additionally, the Playing Pitch and Outdoor Sports Strategy evidence does not identify any need for or shortfall in bowling provision. Therefore, demand and value of a bowling green and justification for including in Clive's Hierarchy of Settlements services and amenities points score are also not justified or sound.</p> <p>Approach inconsistent in Shropshire, with respect to considering changes in amenities and services and subsequent reassessment against the Hierarchy of Settlements methodology e.g. approach in Clive compared to Myddle &amp; Westbury Hub re-assessments &amp; reclassification following notification of loss of services/facilities in these settlements. Clive's settlement designation has been repeatedly and unnecessarily deferred. Evidence required to confirm loss of services has been more onerous than elsewhere &amp; extensive evidence of loss of services in Clive has not been acted on resulting in inclusion as a Hub at Regulation 19 and the need for consideration of settlement status a main modification. Negative impact of this is that if Hub status removed by the Planning Inspector, default would be countryside status and option of Community Cluster, which may have been supported by the community is not now available without lengthy and expensive Neighbourhood Plan process. Inconsistent application of the Hierarchy of Settlements methodology with regard to Clive also raises serious questions over the soundness of the Local Plan.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0128	B002	Clive settlement should be not identified as a Hub & should be removed from Schedule SP2.2	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

1	2	3	4	5	6	7	8
Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0128	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	<p>Policy SP8 defines Community Hubs as significant rural service centres &amp; sets out that the Community Hubs have been identified through a Hierarchy of Settlements Assessment, which has assessed settlement function through a consistent methodology which includes consideration of: population/ households within a settlement; and the extent to which the settlement provides services and facilities, high speed broadband; employment opportunities; and other transport links. However the evidence within Hierarchy of Settlement assessment, is not based on up to date or accurate information and has not been appropriately reviewed and changes to services &amp; facilities have not been considered consistently across all settlements in the Local Plan and therefore Policy SP8 is not justified and unsound. Their deferral of matters relating specifically to the settlement designation of Clive (Wem Place Plan area) also mean the Plan is not effective.</p> <p>Clive hub status is based on inaccurate and out of date evidence on settlement sustainability The Village Store and bowling green amenities included within Hierarchy of Settlements assessment score no longer exist. This is evidenced by various correspondence &amp; communications, meeting minutes, planning applications, Playing Pitch and Outdoor Sports Strategy (Oct 2020) from May 2018 on ( submitted with response). Evidence has been submitted that the shop is unviable and closure permanent ( with a change of use application) and that change of ownership had taken place causing loss of bowling green. Taking into account these changes to available facilities the correct assessment score for Clive should be 47 points which falls below the threshold for Community Hub designation. Inclusion of Clive as a Hub is therefore not justified. Additionally, the Playing Pitch and Outdoor Sports Strategy evidence does not identify any need for or shortfall in bowling provision. Therefore, demand and value of a bowling green and justification for including in Clive's Hierarchy of Settlements services and amenities points score are also not justified or sound.</p> <p>Approach inconsistent in Shropshire, with respect to considering changes in amenities and services and subsequent reassessment against the Hierarchy of Settlements methodology e.g. approach in Clive compared to Myddle &amp; Westbury Hub re-assessments &amp; reclassification following notification of loss of services/facilities in these settlements. Clive's settlement designation has been repeatedly and unnecessarily deferred. Evidence required to confirm loss of services has been more onerous than elsewhere &amp; extensive evidence of loss of services in Clive has not been acted on resulting in inclusion as a Hub at Regulation 19 and the need for consideration of settlement status a main modification. Negative impact of this is that if Hub status removed by the Planning Inspector, default would be countryside status and option of Community Cluster, which may have been supported by the community is not now available without lengthy and expensive Neighbourhood Plan process. Inconsistent application of the Hierarchy of Settlements methodology with regard to Clive also raises serious questions over the soundness of the Local Plan.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0128	B003	Clive settlement should be removed from Schedule SP2.2, Community Hubs (referred to in paragraph 3.56 of Policy SP8),	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0129	B001	Sustainability Appraisal	Para 9.4	No	No	Not Specified	<p>Site selection methodology used by the Council in their site selection has incorrectly assessed site BAY040 within its Sustainability Appraisal and Site Assessment Environmental Report and as such has undermined its opportunity to assist in delivering strategic growth at Bayston Hill.</p> <p>Plan does not conform with NPPF guidance that requires allocations to be based on an adequate, up to date and appropriate evidence base and economic signals which assess the role and function of each settlement and the capacity of these to accommodate new housing and employment growth. Local Plan not based on robust assessment that demonstrates all sites submitted to the Council have been assessed logically taking on board the available evidence. Serious concerns in relation to the omission of site BAY040. Not clear from site assessment how the proposed allocations within Bayston Hill were chosen over BAY040 as all have similar scorings/anticipated development impacts.</p> <p>Article 5(1) of the SEA Directive and regulation 12(2) of the SEA Regulations requires that the environmental report must identify, describe and evaluate the likely significant effects of the reasonable alternatives to the plan taking into account the objectives and geographical scope of the plan. Needs to be clear what reasonable alternatives have been identified and on what basis; how they have been assessed and compared (including consideration of sustainability issues) &amp; what are the preferred alternatives and why are they preferred over alternatives. Proposed two allocations at Bayston Hill have been selected have been through a site sifting process set out in Sustainability Appraisal and Site Assessment Environmental Report (December 2020)( described in response) to provide a scoring with criteria shown in a matrix . Matrix extract illustrates why it is difficult to understand why the lower scoring site BAY039 which achieved a FAIR score chosen over the site at BAY040 which was attributed a higher score and rating of GOOD. Further discrepancies are highlighted within stage 2b with common issues &amp; similarities between perceived constraints across the 3 sites. Site availability &amp; the commissioning of tech reports to demonstrate no constraints to the development had been confirmed for site BAY040 at Reg 18. Thus Shropshire Council in failing to assess site BAY040 and its supporting technical information are in breach of the guidance, including NPPG, having failed in their duty to review all reasonable alternatives, with specific failure to undertake a comprehensive assessment of the alternatives utilising up to date information in relation to site BAY040.</p> <p>Reassessment provided for BAY040 shows suitability for allocation within the Plan. Council need to give the site proper consideration as a demonstrated available, suitable, economically viable and deliverable residential allocation. Supporting information includes Vision statement (a site promotion document provided as an appendix to response)which provides background, planning history, delivery timescales &amp; a summary of key points and recommendations made within technical and environmental assessments (all supplied as appendices) which include ecological constraints &amp; opportunities, landscape and visual impact, transport/access, built heritage &amp; archaeology. These have fed into Concept Framework Plan which incorporates mitigatory measures and design &amp; layout demonstrating delivery of around 250 houses on 17.50 hectare site. Key considerations during the design process has been to assimilate the proposals into the surroundings and to take account of all identified constraints identified. Landscape and visual and highways impact in particular have been pivotal to the approach taken. Framework masterplan derived from a constraints and opportunities assessment informed by the technical and environmental testing of the site. The assessment of landscape opportunities and constraints feed into a masterplan to ensure that a sympathetic layout that respects its landscape and visual context can be achieved. Ecology and Heritage assessments have confirmed that the Ramsar site and Heritage Assets in the area are not constraints to development of the site and recommended mitigation has been taken into account on the indicative plan. All issues fundamental to the decision not to allocate the site for residential use have been dealt with as detailed in respect of: addressing highway and access requirements ( including roundabout access , footway &amp; new bus stops ); sympathetic design to reflect landscape and visual matters ;rights of way, trees, ecological &amp; heritage considerations. Open space &amp; biodiversity opportunities are identified. Vision Statement has addressed all of the concerns raised within the SLAA as well as the refusal reasons cited on a previous proposal for small scale residential development. There are no technical or environmental constraints which would indicate that the site is not capable of being brought forward for development. The site is being promoted by a developer who has an established and proven track record in delivering sites and subsequent housing completions. It is demonstrated that the site is fully capable of providing much needed market and affordable housing in accordance with the policies of the emerging Local Plan.</p> <p>The environmental and technical information available from the consultant reports, can be used with the Council's scoring system to create a clear and reasonable comparison exercise and effectively re-score site BAY040's SA score. The response summarises in a table how the score is increased to 2, taking into account development of the site could include a children's play area and natural open space thereby removing negative scores. The Council has not considered up to date technical information in relation to site BAY040 and have not based their decision on an accurate suitability assessment. Council has failed to properly address reasonable alternatives to the proposed allocations BAY039 and BAY050 within Bayston Hill in clear breach of guidance within the NPPG and SEA Directive. Failure to re-assess in the light of up to date supporting technical &amp; environmental assessment and information relation to site BAY040 when the preferred strategy is fundamentally flawed and leaves the Council at risk of legal challenge.</p>
A0129	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 5.227 ; Policy:S16.2	No	No	Not Specified	<p>Support policy in identifying Bayston Hill as a Community Hub Settlement and providing for around 200 dwellings. Residential development will be delivered through saved allocations; identified Local Plan/ Neighbourhood Plan residential allocations; appropriate, policy compliant small-scale windfall within the settlement boundary. BAY040 should be reconsidered (for the reasons set out in A0129 BA001) and allocated for development.</p>
A0129	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 3.52 ; Policy:SP8	No	Yes	Not Specified	<p>Support policy SP8, noting para 1 and criteria to define appropriate development set out in points a-l with the most notable, being f – which would exclude any proposal that would result in the settlement's residential guideline being exceeded. Also note specific cross reference in f to Paragraph 3 of Policy SP7 which deals with residential guidelines as a policy consideration with Paragraph 4 going on to clarify further approach in respect of additional market housing development outside the settlement development boundaries.</p> <p>This positive approach provides an opportunity for development of Bayston Hill site to come forward in the event that the council cannot give further consideration to allocation within the emerging Plan. Thus it is understood that this policy does exclude proposals coming forward – particularly following reasoning set out in paragraphs 3.49 &amp; 3.50 to SP7 that ; “the guideline is not intended to represent a ceiling on development, but going beyond it by too great a degree could result in unsustainable development.” Also that “the policy also identifies the specific circumstances where consideration will be given to the grant of approval for market housing beyond a defined development boundary. In doing so the policy is clear in the role development boundaries play as a mechanism to positively manage development.” Consider this confusing; the policy states that the guideline is not intended as a ceiling on development providing the guideline figure is not exceeded by too great a degree.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0129	B001	Reassessment of BAY040 required giving proper and full consideration to updated evidence provided ; legal and policy requirements and other issues raised in response. Site BAY040 should be reconsidered on basis of the evidence presented & allocated within the Local Plan.	The Council considers that its Sustainability Appraisal and Site Assessment methodology is comprehensive, robust and complies with both the legal requirements for SA and government policy and guidance on site assessment. No change proposed.	No
A0129	B002	<p>The Council should commit to the inclusion of reserve sites within the Local Plan review identified to meet housing requirements in the event that the Government's standard methodology is once again amended, or delivery of allocated sites is stalled. This would allow the Local Plan Review to be flexible, deal with rapid change and avoid delays and resourcing associated with a partial or wholesale plan review.</p> <p>The alternative would be to follow Stratford upon Avon District approach &amp; include a policy within the Plan requiring the commencement of a separate Site Allocation document to include a series of reserve sites and to be read in conjunction with the Local Plan including adherence to the development strategy.</p> <p>Site BAY040 should be reconsidered on basis of the evidence presented &amp; allocated within the Local Plan.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council also considers that the proposed development strategy for Bayston Hill and the existing commitments, proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. The retention of the Green Gap between Shrewsbury and Bayston Hill is considered an appropriate policy consideration.</p> <p>Proposed site allocations have been informed by a robust and proportionate site assessment process, including consideration of the landscape and policy considerations such as retention of Green Gaps between settlements.</p>	No
A0129	B003	<p>The Council should commit to the inclusion of reserve sites within the Local Plan review identified to meet housing requirements in the event that the Government's standard methodology is once again amended, or delivery of allocated sites is stalled. This would allow the Local Plan Review to be flexible, deal with rapid change and avoid delays and resourcing associated with a partial or wholesale plan review.</p> <p>The alternative would be to follow Stratford upon Avon District approach &amp; include a policy within the Plan requiring the commencement of a separate Site Allocation document to include a series of reserve sites and to be read in conjunction with the Local Plan including adherence to the development strategy.</p>	<p>Shropshire Council considers that the proposed development strategies for each settlement are appropriate, effective, sustainable and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Identification of proposed site allocations has been informed by a proportionate and robust site assessment process.</p> <p>Shropshire Council also considers that it has a robust five year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. Appendix 5 illustrates this supply - identifying completions, commitments (including existing and proposed allocations) and appropriate windfall allowances (for settlements with development guidelines), which totals around 31,000 dwellings (excluding any windfall allowance for the wider rural area).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0130	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	not specified	Yes	Yes	No	<p>Clive Hub: support the designation of Clive as a Community Hub in the new Local Plan to encourage development which will sustain the level of village's facilities into the future. Objections submitted on basis that the Hierarchy of Settlements for Clive is based on facilities that do not exist and will not open again, and that this takes the settlement scoring for Clive below the threshold for designation as a Community Hub are not correct.</p> <p>The village convenience store is a well valued, established, important and needed community facility. Insufficient evidence that loss of shop permanent to justify loss of points awarded. Despite Parish Council support for the current change of use application for reversion to private- still requires Council approval. Objection to the planning application on the basis that rather than an 'A1' retail use , it is a community facility under Class F2(a) of the amended Use Classes Order (2020), and loss of this important community facility is contrary to Core Strategy Policy CS8, and Paragraph 92 of the NPPF. For this reason, the Council have indicated that they will resist the loss of the village shop. The Council highlighted a requirement for additional information and in particular evidence of marketing (at the Council's Cabinet meeting on 7 December 2020). Demonstration of lack of financial viability and marketing evidence however has not been provided with the planning application and given vacancy only since October 2020, scope for marketing would have been severely limited by the pandemic. It is understood that reasons for relinquishing lease were personal and that the business was successful and viable . A continuing need for the facilities has been highlighted by the pandemic.</p> <p>The bowling green facility can be privately owned and qualify as an open space. Whilst not currently in use, the bowling green has not been removed, is included within the Open Space Needs Assessment and removal would need to show this facility is surplus to requirements (in line Sport England advice) as well as meeting any other policy requirements. It therefore should not be deleted from the scoring. There is an additional facility Renshaw's Field, a community owned asset in regular use which should be also be included as an outdoor sports facility which would contribute a further 3 points.</p> <p>No points are scored under the assessment for a public house, however Clive Hub on Back Lane in Clive village is bar and social club open to the public with ( pre Covid19 ) regular opening hours and events which is treated by Clive residents as a public house. Additionally The Railway Inn ,Yorton (approximately 500 metres from the proposed development boundary of Clive) retains its public house sui generis use and is being renovated with the intention of marketing it for rent as a public house later this year. These facilities should be taken into consideration and appropriate points allocated.</p> <p>Whilst Clive has scored four points for community hall, due to the inclusion of Clive Village Hall the Clive Hub provides an additional facility so used as a community events &amp; meeting place Any re-assessment of the scoring for Clive should also consider whether there is a need to include Clive Hub as a secondary community hall, which would add two points to the current score of four, giving six points overall for this category.</p> <p>The Council has undertaken extensive consultation in advance of publication of the Regulation 19 Draft Local Plan &amp; it is sound and legally compliant. As a rural village with a large range of facilities Clive meets the criteria to be designated as a community hub. Inadequate justification for the evidence base relating to Clive's designation as a Community Hub to be reviewed at this stage. Should re-assessment be required the following facilities should be taken into consideration :Convenience Store ( 4 points ) ; Outdoor sports facilities to include the Bowling green (3 points) + Renshaw's field outdoor sports field (+1 point);Clive Hub /Railway Inn as Public Houses ( + 4 points for both or +3 if Clive Hub is not counted); Community Halls to include Clive village hall ( 4 points ) , + 2 points if Clive Hub counted. This could increase total points score from 54 to 61.</p> <p>Land East of Clive Hall: Identified site allocations ( CLV012 &amp; CLV018) for Clive will facilitate delivery of 20 dwellings , needing 18 dwellings to come forward as windfall infill sites, in addition to existing commitments to achieve 40 dwellings proposed for Clive. Land to the East of Clive Hall (as shown on plan provided) which is within the settlement boundary and more accessible to village services and facilities than the allocated sites is well placed to contribute to Plan housing requirements . As it is an even more suitable location for residential development it should be allocated to ensure delivery of the site.</p>
A0131	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2	Not Specified	Not Specified	Not Specified	<p>We note reference in Policy S14.2. Community Hubs: Oswestry Place Plan Area, that St Martins and Weston Rhyn are within the setting of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB). Planning Policy Wales 10 requires development in the setting of an AONB to take account of the special qualities of the designated area. Proposals affecting the setting of the Clwydian Range and Dee Valley AONB must have regard to its identified special qualities in consultation with Natural Resources Wales and the Clwydian Range and Dee Valley AONB Partnership. This policy wording appropriately deals with issues raised on this matter in-our response to the regulation 18 Pre-Submission Draft of the Shropshire Local Plan (DLP) consultation (dated 13/10/2020).</p>
A0131	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Not Specified	Not Specified	Not Specified	<p>We note that Policy SP3 – Climate Change – refers to supporting of renewable and low carbon. We are satisfied with this approach should renewable energy come forward with the potential to impact the setting of the Clwydian Range and Dee Valley AONB. NRW should be consulted should any such schemes come forward.</p>
A0131	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP26	Not Specified	Not Specified	Not Specified	<p>We note Policy DP26 (which supports policy SP3) sets out the criteria for renewable and low carbon infrastructure development with cross reference to other plan policies on the protection of the natural environment. We are satisfied with this approach should renewable energy come forward with the potential to impact the setting of the Clwydian Range and Dee Valley AONB. NRW should be consulted should any such schemes come forward.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0130	B001	If reassessment of Clive Hub is required the submitted information & identified additional facilities should be taken into consideration. Allocation of Land East of Clive Hall	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub. Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities. Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement..</p>	No
A0131	B001	None specified	Support welcomed.	No
A0131	B002	None specified	Support welcomed.	No
A0131	B003	None specified	Support welcomed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0131	B004	Habitats Regulations Assessment	Habitats Regulations Assessment Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses SAC and Midland Meres & Mosses Phase 2 Ramsar	Not Specified	Not Specified	Not Specified	We note that the HRA includes an assessment of the effects upon the Fenns & Whixall Mosses SAC (paragraphs 3.75 – 3.79). The assessment appears to focus on recreational pressures on the site. In our Reg.18 response we highlighted that the site is highly vulnerable to nitrogen (N) deposition and is already widely in exceedance for its bryophyte-rich bog habitat and the SSSI feature waved fork-moss <i>Dicranum bergeri</i> . We received additional information as set out below from your authority via email dated 01/02/2021. The nearest site allocation for housing is 3.8km from the designated site and the Traffic Report (Traffic Impact on Air Quality at International Sites for the Habitat Regulations Assessment, WSP, 6 July 2020) commissioned by SCC shows that there are no busy roads within 200m of the designated site (the nearest is over 500m away). A likely significant effect (LSE) from traffic emissions was ruled out in section 2.32 of the Reg.19 HRA. As would be expected for a Local Plan, site allocations do not include intensive livestock units, agricultural renovations, anaerobic digester plants or other developments likely to generate significant amounts of atmospheric N. The nearest allocated employment sites are between 4.3 and 7.1km from the SAC. Any development proposed on land not allocated in the plan, which may generate atmospheric N, will be considered as described in the Regulation 19 HRA sections 2.15 – 2.26, and particularly 2.27 – 2.28. As the type and location of any windfall development is unknown, protection would be provided by applying policies DP12. The Natural Environment, DP18. Pollution and public amenity, DP26. Strategic, Renewable and Low Carbon Infrastructure and SP10. Managing Development in the Countryside. In view of this, SCC considers there will not be a LSE on the Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses SAC via atmospheric N as a result of the Shropshire Local Plan. We concur with this conclusion.
A0131	B005	Habitats Regulations Assessment	Habitats Regulations Assessment Berwyn SPA and Berwyn and South Clwyd Mountain SAC	Not Specified	Not Specified	Not Specified	A meeting was held between NRW and representatives from the SCC Planning Policy team on the 12th January 2021 to discuss matters previously raised in our Reg.18 response. Clarification was provided on the general approach to investigating potential impacts from traffic emissions on internationally designated wildlife sites used in the DLP HRA. We are satisfied with the conclusions for this site (a copy of the meeting notes are provided in our Appendix 1).
A0131	B006	Habitats Regulations Assessment	Habitats Regulations Assessment River Dee and Bala Lake Special Area of Conservation (SAC)	Not Specified	Not Specified	Not Specified	Following our Reg.18 response, we have since, during January 2021, issued the results of phosphate monitoring for Welsh riverine SACs. This is presented in Evidence Report No. 489 Compliance Assessment of Welsh River SACs against Phosphorus Targets. In summary the evidence report found localised phosphorus failures in the River Dee. We note that part of the northernmost section of Shropshire falls within the catchment of the River Dee. Residential allocations at Weston Rhyn (c.126 dwellings) and part of site STM0029 at St Martins with SMH038 (140 dwellings) plus the Community Clusters at 'Rhoswiell, Wern and Chirk Bank' and 'Selattyn, Upper/Middle/Lower Hengoed and Pant Glas' fall within the Upper Dee catchment and are around 1-2 km from the river. Whitchurch falls within the Middle Dee catchment (12km away from the river itself). The assessment (pages 33 and 34 of the HRA) indicates that a LSE could not be ruled out on the SAC and so policies defer down to mitigate at project level. This is detailed at paragraph 3.37 onwards where it states that 'either the capacity is available for the plan period or upgrades at the appropriate time are technically possible' and it is concluded 'through the Water Development Policies and Settlement Policies wording and the statutory requirement for a project level HRA for development, there will be no adverse effects on the integrity of the River Dee and Bala Lake SAC as a result of the Draft Local Plan' [sic]. We have taken early steps, via our Planning Position Statement and Interim Planning Advice Following River SAC Compliance Report, following the publication of Evidence Report 489 on how in our opinion it affects policy preparation and development management. These standing advice documents outline the information needs we believe a competent authority, under the Habitat Regulations, should consider in preparing the HRA for a plan or project. In light of the new evidence report we advise the information presented in these documents should be considered in the HRA for the DLP.
A0131	B007	Habitats Regulations Assessment	Habitats Regulations Assessment Severn Estuary SAC, SPA, RAMSAR	Not Specified	Not Specified	Not Specified	In terms of Severn Estuary SAC, SPA, RAMSAR we note the HRA conclusion that 'application of policies DP20. to 23. in the DLP will protect water courses and water bodies, and in so doing are likely to prevent adverse effects on site integrity, alone and in combination, on international sites (paragraph 3.20). We concur with this conclusion.
A0131	B008	Habitats Regulations Assessment	Habitats Regulations Assessment Tanat & Vyrnwy Bat SAC	Not Specified	Not Specified	Not Specified	We would refer you to our previous comments to the Reg.18 consultation which identified that there is recent evidence to suggest that there is cross-border movement of protected species (lesser horseshoe bats) between Shropshire and Powys, although not specifically from the sites that make up this SAC. This may have implications where development could impact on potential commuting routes/ corridors of vegetation between the counties and should be considered at the planning application stage. We note and welcome the proposed amendments to the policy wording of Policy S14.2 which acknowledges this matter.
A0131	B009	Habitats Regulations Assessment	Habitats Regulations Assessment Montgomery Canal SAC	Not Specified	Not Specified	Not Specified	We would refer you to our previous comments to the Reg.18 consultation which advised that NRW should be formally consulted when any plans to re-open the canal to boat movements close to the Welsh border at Llanymynech come to fruition, and that a HRA will be required.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0131	B004	None specified	Support welcomed.	No
A0131	B005	None specified	Support welcomed.	No
A0131	B006	None specified	Support welcomed.	No
A0131	B007	None specified	Support welcomed.	No
A0131	B008	None specified	Support welcomed.	No
A0131	B009	None specified	Noted. No change proposed.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0131	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Sites of Special Scientific Interest (SSSIs)	Not Specified	Not Specified	Not Specified	Following our Reg.18 consultation response, which questioned the approach taken to the assessment of potential impacts upon Welsh SSSIs, your Authority confirmed that a 500m buffer was applied to assess indirect effects on SSSIs arising from sites promoted for housing and/ or employment use in the DLP. For project level assessment we would expect any SSSIs within 200m of a development site to be assessed for potential impacts upon air quality from housing/ commercial development e.g. as a result from dust during the construction stage or traffic generation. The approach taken goes over and above this screening distance and therefore appears appropriate for housing/ commercial development site allocations. You have confirmed that there is only one proposed allocation in Shropshire within 500m of a Welsh SSSI (Montgomery Canal SSSI). We are satisfied that any impacts upon that site have been adequately assessed. Other forms of development (e.g. intensive agricultural use or large-scale combustion processes) have the potential to impact Welsh designated sites. However, we understand that there is uncertainty as to where and when certain types of development which may result in point sources of air pollution will come forward within the local plan area. We note that the DLP includes relevant policies that would require assessment of the potential impacts of such development on Welsh designated sites (National Site network and SSSIs).
A0131	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Habitats Regulations Assessment Protected species	Not Specified	Not Specified	Not Specified	We are of the view that the submission is not likely to be detrimental to the maintenance of the Favourable Conservation Status of any the Welsh populations of protected species. We advise that our response identifies the requirement to consider mobile species included on Schedule 2 of the Habitats and Species Regulations 2017 (as amended). Considering the proposed allocations and extent and connectivity of the National Site Network, this will effectively be the otter in respect of the Dee catchment. We advise that our responses identify the requirement to ensure continued breeding, foraging and dispersal within the catchment.
A0132	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	Not Specified	Object to the draft Shropshire Local Plan as key evidence is missing, needed to make the draft Shropshire Local Plan legally sound; it fails to comply with the tests of soundness in the National Planning Policy Framework; the Gunning Principles and needs of the Local Community. The proposed strategy selected must be supported by proportionate evidence justifying it, all alternatives must be considered and it must be demonstrated that the selected strategy is truly community led. Do not feel there is evidence to support the proposition that the planned level of development in the Bridgnorth and surrounding Parishes is deliverable. To be justified as an appropriate strategy based upon credible evidence, including: -Justification for proposed housing and employment guidelines in Bridgnorth/Shropshire. -A Local Housing Needs Assessment for Bridgnorth Place Plan Area. Without this, consultees cannot reach informed decisions on appropriateness of housing proposals for Bridgnorth/surrounding Parishes or the draft Shropshire Local Plan. -Credible evidence demonstrating how significant shortfalls in past delivery of jobs, housing and businesses will be addressed. The Shropshire AMR (2017-18) indicates 6.5ha of employment development completed between 2006 and 2017, an average of 0.6ha. The AMR also anticipates "Bridgnorth and Shifnal could both perform stronger roles in the delivery of employment development to meet demands for economic growth arising in part from the rate of housing development in these settlements but this is currently constrained by the limited availability of land for employment development". No evidence to suggest Bridgnorth is an attractive location for new employment development and concerned about whether this is realistic given the town's relatively weak transport connectivity. Also note the Viability Study (VS) undertaken to inform the draft Shropshire Local Plan indicates Office and Industrial development is generally unviable (albeit "larger industrial" development on greenfield sites is marginal), it also indicates this is not unique to Shropshire and where development is coming forward (and it is coming forward), it tends to be from existing businesses for operational reasons, rather than purely for property investment reasons. The VS concludes hotels, prime retail, supermarkets and retail warehouses are viable but these are not the types of developments proposed on employment allocations at Bridgnorth. The VS also does not include separate viability calculations for employment development at Stanmore and Tasley Garden Villages (part of mixed use allocations), whilst the proposed extension to Stanmore Industrial Estate capitalises on existing on-site infrastructure. -Level of employment development proposed for Bridgnorth is unclear. Para 1 of draft Policy S3.1 states 49ha (this appears to comprise SAMDev allocations (13.3ha net developable - albeit part is for the relocation of the existing livestock market), Green Belt land adjacent to Stanmore Industrial Estate (11.4ha) and Tasley Garden Village (16ha), however this does not total 49ha. further Schedule A6 gives a figure of 37.7ha for Bridgnorth and surrounding Parishes. This comprises 9.1% of the County total, in contrast residential development guidelines for Bridgnorth comprise 5.8% of the County total. -A Highways Assessment. The draft Shropshire Local Plan states a highways assessment for Bridgnorth will be undertaken, however, this has not yet occurred and consider the draft Shropshire Local Plan cannot be sound without it. This assessment should also explain how Bridgnorth can be part of the Strategic Transport Corridor, a central strategic plank of the draft Shropshire Local Plan. -The strategic approach in the draft Shropshire Local Plan responds o the Economic Growth Strategy for Shropshire and specifically reflects objectives to prioritise investment in strategic locations/growth zones along strategic corridors, utilising existing road and rail connections. Growth assumptions for Bridgnorth are based on claims/assumptions that Bridgnorth is no a strategic corridor, which it is not. The document 'Investing in Strategic Transport Corridors in The Marches', which underpins 'The Marches Economic Growth Strategy for Shropshire' advises Bridgnorth is not positioned on a strategic transport corridor. This casts doubt on Shropshire Cabinet's ability to make an informed decision, as information is incorrect or unavailable. -An Infrastructure Plan, which we would expect to cover the necessary infrastructure to support the proposed/any level of growth. -Credible evidence demonstrating the sustainability of the draft Shropshire Local Plan, based upon past delivery of jobs from the current SAMDev allocation. -There is no Local Transport Plan available to inform Regulation 18/19 consultations or Shropshire Cabinet decisions. This casts doubts on the ability to make informed decisions about soundness.
A0133	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0131	B010	None specified	Support welcomed.	No
A0131	B011	None specified	Noted	No
A0132	B001	<p>Shropshire Council must provide all credible evidence that is missing before Cabinet and Council are asked to submit the Local Plan to the inspectorate. The strategy selected must be backed up with proportionate credible evidence justifying the strategy, all alternatives must be considered and Shropshire Council must demonstrate that the selected strategy is truly community lead.</p> <p>Recommend the draft Shropshire Local Plan is modified, in line with the proposals in the 1st edition of the Bridgnorth Plan. In brief we recommend the scale of development around Bridgnorth be reduced over the plan period 2019 to 2036 to no more than 1,000 dwellings in total, no single site is selected, and the Regulation 18 Consultation is repeated ensuring community involvement.</p>	<p>Noted.</p> <p>Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market.</p> <p>Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.</p> <p>The evidence base assembled to inform the draft Shropshire Local Plan is considered proportionate and robust. It includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council; a Strategic Infrastructure Providers and a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans; an Economic Development Needs Assessment and an Employment Land Review.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review. A Strategic Transport Assessment for Bridgnorth is also being undertaken to inform infrastructure requirements in association with development proposals for the town.</p> <p>Shropshire Council also considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the Gunning Principles. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No
A0133	B001	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0133	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0133	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0133	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0133	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0134	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0133	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0133	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0133	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0133	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0134	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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A0134	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0134	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0134	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0134	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0135	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.



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A0134	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0134	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0134	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
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A0135	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
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A0136	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0136	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0136	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0136	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0136	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0137	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	No	No	No	<p>The draft Shropshire Local Plan is unsound as it does not include Land at Junction 3 as a strategic site allocation.</p> <p>The only explanation for excluding Land at Junction 3 is that from the Cabinet Report on the 7th December 2020, which stated that in weighing up competing considerations, including the benefits of providing a strategic employment area, there remained insufficient justification to release this land from the Green Belt. Consider there is sufficient justification and exceptional circumstances (note that there is no definition of what constitutes such circumstances, this is down to the judgement of the local authority) for including Land at Junction 3 as a strategic allocation. Key considerations (further detail on these point provided below) are: a.Supporting aspirations of the Shropshire Economic Growth Strategy and West Midlands Combined Authority SEP. b.Supporting the medium- and long-term needs of existing businesses and attract new businesses, particularly in the engineering and manufacturing sector. c.Supporting strategic transport and social infrastructure investment within the M54 Corridor. d.Black Country Unmet Needs (see above). e.Supporting the Role of RAF Cosford.</p> <p>Section 33A of the Planning and Compulsory Purchase Act 2004 ("the 2004 Act") and Paragraphs 24-27 of the National Planning Policy Framework (NPPF) (supplemented by National Planning Practice Guidance (NPPG)) require Local Planning Authorities to undertake a "duty to co-operate". There is a significant unmet housing and employment need arising within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) and there has not been effective cooperation in meeting this cross-boundary strategic need. As such the decision to not include Land at Junction 3 as a strategic site allocation (to contribute to these unmet needs) and to not engage effectively and on an ongoing basis with the Association of Black Country Authorities (ABCA) has resulted in a strategy which is not positively prepared or justified. As such, the duty to co-operate has not yet been fully complied with.</p> <p>-The core proposal for Land at Junction 3 has been consistently promoted throughout the Local Plan process. This is a highly sustainable, vibrant and high-quality designed new community capable of accommodating a strategic employment area of up to 50ha (to accommodate enterprises of a range of scales anchored by a training and skills hub), a strategic housing site for approx. 3,000 homes (across 4 well related neighbourhoods) and a comprehensive range of supporting facilities and services (including shops, community buildings, medical centre, 2 primary schools and a secondary school), embedded within a wealth of green infrastructure (over 400ha, including a 60ha Country Park, public parks, play areas, formal sport provision and an extensive informal recreation network). An initial illustrative Masterplan (appended to the representation) was prepared, informed by assessments of key constraints and opportunities, including a high-level market analysis. Site viability was also confirmed (although the strategic employment area was reliant on the wider proposals).</p> <p>-Land at Junction 3 was identified as a 'potential strategic site' within the Regulation 18 Strategic Sites Consultation, within which it was recognised as a "once in a generation opportunity to meet cross-boundary needs, through delivery of nationally significant employment opportunities, high quality housing and a local centre to provide services, facilities and infrastructure as part of a planned new settlement within an important strategic corridor." In response to this consultation, the Association of Black Country Authorities (ABCA) strongly supported the allocation of Land at Junction 3.</p> <p>-Proposals for Land at Junction 3 were refined in 2020 in response to changing economic circumstances and a more detailed market analysis (appended to this representation), which illustrated a clear need for additional employment land of a sufficient scale to meet demand for B2/B8 uses and identified a strong case to extend the strategic employment area. The strategic employment area (always fundamental) is now considered vital to support economic recovery and Government Policy, particularly given the acknowledged critical undersupply of strategic employment sites in the region. An updated Illustrative Masterplan (appended to the representation) was therefore prepared. Refined proposals for the strategic employment area mean it could be expanded to 75ha (same overall site boundary with around 500 less dwellings but same range of on-site facilities); could accommodate an education campus linked to Wolverhampton University; is viable in and of itself; and can occur either in advance or without any associated residential development (no cross-subsidy required). The updated Illustrative Masterplan also illustrates a potential location for a solar farm north of the site, as an integral part of the zero carbon strategy for Land at Junction 3.</p> <p>-The updated Illustrative Masterplan and emerging proposals for Junction 3 can evolve/respond to engagement with the local community and stakeholders. A comprehensive Masterplan could be prepared for the site and adopted by Shropshire Council. The comprehensive Masterplan and development would need to comply with any site guidelines.</p> <p>-The benefits of a strategic employment area Land at Junction 3 include 6,000-9,100 jobs; greater accessibility to jobs, reducing out-commuting for those living in the area (and leaving service at RAF Cosford); £290m - £440m GVA per annum into the economy; £4.5m additional business rates; an education campus focussing on re/up-skilling, benefitting employees and firms, forming part of the wider educational network in the area and promoting employment growth linked to engineering and aeronautical focus of RAF Cosford; supporting sustainable transport improvements in the Strategic Transport Corridor (including business case for rail improvements complementing other planned improvements such as M6/M6 toll link, West Midlands Rail Freight Interchange, Birmingham-Shrewsbury Rail Improvements; HS2 and metro line extensions); an embedded net zero carbon strategy (through a combination of efficiency, solar generation, heat pumps, electric vehicles and energy storage); net Environmental Gain; new public transport, pedestrian and cycle links (integrating into existing networks); a safeguarded green buffer to Tong Village; and compensatory improvements to the Green Belt.</p> <p>-The additional benefits of also delivering the residential development at Land at Junction 3 include: 510ha of open space; enhanced formal and informal recreation; new and enhanced bus routes (also service other communities) linked to nearby railway stations; affordable and lifetime homes; and self-containment with opportunities to live close to employment opportunities and new community facilities (education, healthcare, local food hub etc), with associated employment opportunities and reducing impact on surrounding road networks.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0137	B001	<p>Increase the housing and employment requirements to accommodate more unmet needs arising in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) - to at least 4,500 dwellings and at least 90ha employment land.</p> <p>Remove Land at Junction 3 from the Green Belt (370ha) and include it as a strategic settlement to achieve the additional cross-boundary housing and employment need (3,000 dwellings and 75ha employment land). The remaining 1,500 dwellings and 15ha of employment land could be accommodated on non-strategic sites at Bridgnorth and Shifnal.</p> <p>Land at Junction 3 also offers significant wider benefits as documented within the representation.</p> <p>To reflect this, appropriate changes should be made to draft Policy SP2, draft Schedule SP2.1; and paragraphs 3.7 and 3.18 of the proposed Explanation to draft Policy SP2. A new Policy (suggest reference S22) should also be included for the Strategic Settlement: Land to the north of Junction 3. The representation documents these suggested changes and provides an example of suggested new Policy S22.</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by an robust and proportionate site assessment process, which explains why sites are or are not proposed for allocation.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0137	B001 Cont'd						<p>Proposals are supported by location plans, masterplans, and technical assessments including on employment needs, housing and employment needs, development principals, green infrastructure, green belt, archaeology, ecology, transport/updated transport, flood risk and surface water drainage, land quality, utilities, heritage, and landscape and visual (appended to this representation). They confirm there are no 'in principle' constraints and demonstrate how Land at Junction 3 could be delivered, based on best practice, achieve a sensitive design and mitigate any negative impacts. Transport proposals (including active travel and sustainable transport links) ensure sustainable development is achieved for either the residential and employment proposal or stand-alone employment proposal.</p> <p>-Proposals have also been informed by engagement with the Council, local community and key stakeholder - committed to this continuing.</p> <p>-A site specific Green Belt assessment has been undertaken for Land at Junction 3 (appended to this representation), using the same methodology as that for the Local Plan Review. This concludes parcels of land proposed for removal from the Green Belt would result in low-moderate or moderate harm to the Green Belt; land at Junction 3 has clearly defined and strong Green Belt boundaries to north (A5), east (A41), south (M54) and west (existing and proposed roads/hedgerows); and highlights where remaining Green Belt land would present an opportunities for compensatory improvements.</p> <p>-Consider commercial rental values and yields identified within the Viability Assessment undertaken to inform the draft Shropshire Local Plan are overly optimistic. Assumptions for strategic sites should also be treated differently from 'typical' sites to reflect higher risk, scale and timescales. An initial, high level viability appraisal, undertaken for Land at Junction 3, confirms an employment-led mixed-use scheme and associated community facilities/infrastructure is viable without any Council funding, allowing them to focus on applying the economic and revenue benefits secured. Discussions have also occurred with Home England who indicated they would in principle provide loan support to assist in accelerating delivery (although only if residential is included).</p> <p>-RAF Cosford is in proximity Land at Junction 3, which presents a potential to complement its employment growth and link to the increased focus of the base as the RAF's centre for engineering and aeronautical training. To date, many high-skilled individuals leaving the RAF relocate out of the area because of lack of appropriate private sector opportunities. Land at Junction 3 would present an opportunity to retain these individuals. The base would also benefit from sustainable transport measures linked to Land at Junction 3.</p> <p>-Land at Junction 3 is in a single ownership with a committed landowner. Intention would be early commencement of the strategic employment area, associated services and housing with options to phase over time.</p> <p>-The Shropshire Economic Growth Strategy seeks to deliver a step change in capacity/productivity of the local economy and to focus on strategic corridors, which are widely recognised as key drivers for economic growth. The M54 is one such corridor.</p> <p>-The M54 Growth Corridor – Strategic Options Study undertaken to inform the draft Shropshire Local Plan identifies the M54 as a key strategic gateway for both Shropshire and neighbouring local authorities and as such a key growth Corridor for employment and residential development. The Study considers the M54 ripe for investment to provide 'fit for purpose' employment land that meets the needs of the modern occupier and responds to market demand, which will assist in diversifying the economy and attracting higher value sectors that drive economic productivity and retain talent in the Country. It also identifies Land at Junction 3 as a potential priority location for employment and residential development.</p> <p>-The Employment Land Review undertaken to inform the draft Shropshire Local Plan divides employment land opportunities into three categories (strategic, significant local and other local). Strategic employment opportunities include at Shrewsbury and/or nodes on strategic corridors. Proposed allocations in the Plan in the east of the County at Shifnal, Albrighton, Bridgnorth and Ironbridge are not located in such key locations with direct access/visibility from strategic corridors (commercial analysis of employment land appended to representation). In comparison Land at Junction 3 benefits from direct access onto Junction 3 of the M54 at the heart of this strategic corridor (the strategic employment area is capable of expanding to 75ha).</p> <p>-Aware of several employers with large-scale requirements along the M54 corridor, which could not be accommodated at Shifnal, Albrighton, Bridgnorth or Ironbridge.</p> <p>-Furthermore the Strategic Economic Plan (SEP) and Local Industrial Strategy for the West Midlands Combined Authority also outline ambitious plans for growth in the region.</p> <p>-The Economic Development Needs Assessment (EDNA) undertaken to inform the draft Shropshire Local Plan indicates a quantitative need for between 164 and 264ha of employment land (including 30ha contribution to unmet need arising in the Black Country) over the proposed Local Plan period, with a 30% office to 70% industrial/distribution split. This assumes all undeveloped employment allocations/commitments come forward. As the existing supply in Shropshire is some 276ha and the proposed Plan target is 300ha, headroom could be attributed to further meeting unmet cross-boundary need arising in the Black Country, particularly given the scale of this unmet need.</p> <p>-National Planning Practice Guidance (NPPG) explains employment requirements in Plan's must consider both quantitative and qualitative needs for all foreseeable types of economic activity over the Plan period (as confirmed within the EDNA). Qualitative factors for Shropshire include: significant and increasing demand for advanced industrial/logistics premises in locations with good access to the M54 (the EDNA acknowledges demand for upper end 'Mid Box' scale (30,000sq.ft – 100,000sq.ft) industrial units which is likely greater in areas with good connections to the A5 and M54 (positively impacted by demands from rapid recent growth of e-commerce and re-shored supply chain). For 'Big Box' scale (100,000+sq.ft) the EDNA reports limited demand.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0137	B001 Cont'd			

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0137	B001 Further Cont'd						<p>However an Employment Needs Assessment (appended to this representation) commissioned to inform Land at Junction 3 considers this is because of no readily available supply of suitably located, high quality stock. It also considers high demand exists in Shropshire and the wider West Midlands from logistics and manufacturing sectors (Grade A quality), but only a very limited supply (1.64 years including 1/3 Grades B/C) is available); significant undersupply of good quality, larger stock available in the east of Shropshire, and the wider West Midlands to cater for this demand (the EDNA found modern stock largely catered to smaller occupiers/trade counters and much of the existing larger stock is dated and in need of refurbishment to meet requirements of modern occupiers. The West Midlands Strategic Employment Sites Study defines 'strategic sites' as at least 25ha and confirms a severe lack of such sites, the West Midlands Land Commission found a similar shortfall, and the Secretary of State decision on the West Midlands Rail Freight Interchange found a significant level of need for additional logistics floorspace in the region and strong market demand and shortage in the supply of large warehouse buildings and sites); and the subsequent consequences in not meeting the growth aspirations of the Shropshire Economic Growth Strategy and the West Midlands SEP (the EDNA concluded there was a lack of 'over ready' employment land despite market demand risking those seeking premises locating elsewhere).</p> <p>-Unmet employment need arising in the Black Country is estimated at between 287ha and 565ha, this is for large scale hi-tech manufacturing and national and regional distribution centres that have very specific location criteria, requiring close links to the strategic highway network (this also minimises congestion and environmental nuisance). Ideal locations are therefore at motorway and major A road nodal junctions, as identified in the Council's EDNA and Employment Land Review. No Local Authorities have committed to making contributions to this unmet need, therefore if this unmet need is to be reduced, reliable and timely action must be taken. Proposed employment land around Shifnal and Bridgnorth are not of sufficient scale/appropriately located to contribute meaningfully (see commercial analysis appended to representation) and a 30ha contribution is too small. Locations alternative to Land at Junction 3 on the M6, M54 and A roads are extremely limited and constrained. With these constraints it is unclear how these industrial sectors, central to the concept of the 'Midlands Engine', can expand and they may relocate, possibly out of the UK (associated implications for supply chains, investment and employment).</p> <p>-Unmet housing need arising in for the wider Greater Birmingham and Black Country Housing Market Area (GBBCHNA) is also very significant. Birmingham and the Black Country Authorities combined have an annual unmet need of approximately 3,277dpa. This needs to be comprehensively addressed, ideally as soon (rather than deferred in order to boost the supply of housing) and close to the source as possible (greater distances can be justified where there are good transport links). It is therefore necessary to look at surrounding 'doughnut' authorities (complicated by unmet need in Coventry of 1,243dpa although Local Housing Need has increased for Coventry, so it may be higher) as some authorities adjoining both, there capacity needs to be shared. Estimate these 'doughnut' authorities can accommodate between 611dpa and 722dpa of the 3,277dpa unmet need (less than a quarter). There may be an expectation for these authorities to accommodate more when Plans are next reviewed and efficiencies gained through better use of brownfield/change of use of land, a significant shortfall will remain. Therefore it is crucial that the net is cast wider, particularly in terms of areas with the best transport links with Birmingham and the Black Country. East is unrealistic due to other unmet need (Coventry, Derby and Leicester); South is the AONB and pressure associated with Cambridge/Oxford; north is Stoke-on-Trent, which has seen its local housing need increase from 500dpa to 684dpa and the city is surrounded by Green Belt that may cause constraints. In between is Stafford which may have potential but is only at an early stage in its Local Plan Review. To the west is Shropshire proposing only a modest 83dpa (1,500 total) contribution. Given Shropshire is the fourth largest local authority by area in England, has land closer to Wolverhampton than much of Lichfield is to Walsall and benefits from both direct motorway and train links, this contribution is paltry. Green Belt cannot be considered a good reason for this, South Staffordshire and Lichfield are both much smaller authorities but covered by the Green Belt to a far greater extent, yet are offering to accommodate more unmet need.</p> <p>-All reasonable options for meeting the Black Country needs have been examined (brownfield/under-utilised land has been maximised; Black Country Green Belt capacity considered; and discussions have occurred with neighbouring authorities. Given the scale of the unmet needs of the Black Country; size of Shropshire relative to neighbours; and lack of readily identifiable, suitable, reliable and deliverable alternatives, Land at Junction 3 could be of major significance in helping satisfy this unmet need and fulfilling the aims of various economic strategies/plans. Land at Junction 3 is a sustainable, attractive and appropriate option for meeting Black Country and wider West Midlands needs because it offers access to an unconstrained M54 junction within a Strategic Growth Corridor; a different yet still attractive market location; comprehensive development co-locating housing and employment; and a diverse and distinctive offer (mixed uses, a full spectrum of scale, including grow-on space, embedded skills and training, plus the potential benefits of living and working within the same development). On this basis, recommend Shropshire increases its housing and employment requirements to accommodate more unmet needs arising in the Black Country - at least 4,500 dwellings and at least 90ha employment land. This additional provision plus 15ha of the existing employment offer (3,000 dwellings and 75ha employment land total) can be accommodated on Land at Junction 3 (complemented by 1,500 dwellings on residential allocations and 15ha of employment land on non-strategic sites at Bridgnorth and Shifnal).</p>
A0137	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	No	No	No	<p>Object to draft Policy SP2 and consider it is unsound and fails to comply with the duty to cooperate.</p> <p>The spatial distribution proposed in draft Policy SP2 does not positively or effectively respond to identified strategic priorities, notably of the Shropshire Economic Growth Strategy which seeks to deliver a 'step-change' in capacity and productivity of the local economy and to focus major employment development on strategic corridors.</p> <p>Shropshire Council has undertaken an assessment of the Local Housing Need using Government's standard methodology. This is likely to be appropriate to meet indigenous demographic-led needs. However, unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) is significant and there has not been effective cooperation in meeting this cross-boundary strategic need. There is also a significant unmet employment need and consider a contribution of more than the proposed 30ha would be appropriate. As such, draft Policy SP2 does not positively or effectively respond to relevant cross-boundary strategic matters, including the significant unmet employment and housing need arising in the Black Country. Proposals to provide 30ha of employment land and 1,500 dwellings towards this unmet need is insufficient in quantitative and qualitative terms.</p> <p>Consider employment land provision and take-up will not be as successful as anticipated resulting in implications for achieving the objectives of the Shropshire Economic Growth Strategy, the West Midlands Strategic Economic Plan (SEP) and the West Midlands Local Industrial Strategy.</p> <p>Consider Land at Junction 3, close to RAF Cosford and at the heart of the M54 Corridor, should be identified as a strategic settlement. It would represent an effective and sustainable form of development; support identified economic development needs (including the Shropshire Economic Growth Strategy and West Midlands SEP); would be complementary to proposals at Shifnal; is well located to meet housing and employment needs arising in the Black Country, with direct access via M54 and Cosford Railway Station; and would have close links to businesses in the Black Country and major employment sites at i54 and T54.</p> <p>Consider exceptional circumstances exist to support the allocation of Land at Junction 3 (see A0137 B001).</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0137	B001 Further Cont'd			
A0137	B002	<p>Increase the housing and employment requirements to accommodate more unmet needs arising in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) - to at least 4,500 dwellings and at least 90ha employment land.</p> <p>Remove Land at Junction 3 from the Green Belt (370ha) and include it as a strategic settlement to achieve the additional cross-boundary housing and employment need (3,000 dwellings and 75ha employment land). The remaining 1,500 dwellings and 15ha of employment land could be accommodated on non-strategic sites at Bridgnorth and Shifnal.</p> <p>Land at Junction 3 also offers significant wider benefits as documented within the representation.</p> <p>To reflect this, appropriate changes should be made to draft Policy SP2, draft Schedule SP2.1; and paragraphs 3.7 and 3.18 of the proposed Explanation to draft Policy SP2. A new Policy (suggest reference S22) should also be included for the Strategic Settlement: Land to the north of Junction 3. The representation documents these suggested changes and provides an example of suggested new Policy S22.</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by an robust and proportionate site assessment process, which explains why sites are or are not proposed for allocation.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0137	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Schedule SP2.1 of SP2	No	No	No	<p>Object to draft Policy SP2 and consider it is unsound and fails to comply with the duty to cooperate.</p> <p>The spatial distribution proposed in draft Policy SP2 does not positively or effectively respond to identified strategic priorities, notably of the Shropshire Economic Growth Strategy which seeks to deliver a 'step-change' in capacity and productivity of the local economy and to focus major employment development on strategic corridors.</p> <p>Shropshire Council has undertaken an assessment of the Local Housing Need using Government's standard methodology. This is likely to be appropriate to meet indigenous demographic-led needs. However, unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) is significant and there has not been effective cooperation in meeting this cross-boundary strategic need. There is also a significant unmet employment need and consider a contribution of more than the proposed 30ha would be appropriate. As such, draft Policy SP2 does not positively or effectively respond to relevant cross-boundary strategic matters, including the significant unmet employment and housing need arising in the Black Country. Proposals to provide 30ha of employment land and 1,500 dwellings towards this unmet need is insufficient in quantitative and qualitative terms.</p> <p>Consider employment land provision and take-up will not be as successful as anticipated resulting in implications for achieving the objectives of the Shropshire Economic Growth Strategy, the West Midlands Strategic Economic Plan (SEP) and the West Midlands Local Industrial Strategy.</p> <p>Consider Land at Junction 3, close to RAF Cosford and at the heart of the M54 Corridor, should be identified as a strategic settlement. It would represent an effective and sustainable form of development; support identified economic development needs (including the Shropshire Economic Growth Strategy and West Midlands SEP); would be complementary to proposals at Shifnal; is well located to meet housing and employment needs arising in the Black Country, with direct access via M54 and Cosford Railway Station; and would have close links to businesses in the Black Country and major employment sites at i54 and T54.</p> <p>Consider exceptional circumstances exist to support the allocation of Land at Junction 3 (see A0137 B001).</p>
A0137	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 3.7 of SP2	No	No	No	<p>Object to draft Policy SP2 and consider it is unsound and fails to comply with the duty to cooperate.</p> <p>The spatial distribution proposed in draft Policy SP2 does not positively or effectively respond to identified strategic priorities, notably of the Shropshire Economic Growth Strategy which seeks to deliver a 'step-change' in capacity and productivity of the local economy and to focus major employment development on strategic corridors.</p> <p>Shropshire Council has undertaken an assessment of the Local Housing Need using Government's standard methodology. This is likely to be appropriate to meet indigenous demographic-led needs. However, unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) is significant and there has not been effective cooperation in meeting this cross-boundary strategic need. There is also a significant unmet employment need and consider a contribution of more than the proposed 30ha would be appropriate. As such, draft Policy SP2 does not positively or effectively respond to relevant cross-boundary strategic matters, including the significant unmet employment and housing need arising in the Black Country. Proposals to provide 30ha of employment land and 1,500 dwellings towards this unmet need is insufficient in quantitative and qualitative terms.</p> <p>Consider employment land provision and take-up will not be as successful as anticipated resulting in implications for achieving the objectives of the Shropshire Economic Growth Strategy, the West Midlands Strategic Economic Plan (SEP) and the West Midlands Local Industrial Strategy.</p> <p>Consider Land at Junction 3, close to RAF Cosford and at the heart of the M54 Corridor, should be identified as a strategic settlement. It would represent an effective and sustainable form of development; support identified economic development needs (including the Shropshire Economic Growth Strategy and West Midlands SEP); would be complementary to proposals at Shifnal; is well located to meet housing and employment needs arising in the Black Country, with direct access via M54 and Cosford Railway Station; and would have close links to businesses in the Black Country and major employment sites at i54 and T54.</p> <p>Consider exceptional circumstances exist to support the allocation of Land at Junction 3 (see A0137 B001).</p>
A0137	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 3.18 of SP2	No	No	No	<p>Object to draft Policy SP2 and consider it is unsound and fails to comply with the duty to cooperate.</p> <p>The spatial distribution proposed in draft Policy SP2 does not positively or effectively respond to identified strategic priorities, notably of the Shropshire Economic Growth Strategy which seeks to deliver a 'step-change' in capacity and productivity of the local economy and to focus major employment development on strategic corridors.</p> <p>Shropshire Council has undertaken an assessment of the Local Housing Need using Government's standard methodology. This is likely to be appropriate to meet indigenous demographic-led needs. However, unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) is significant and there has not been effective cooperation in meeting this cross-boundary strategic need. There is also a significant unmet employment need and consider a contribution of more than the proposed 30ha would be appropriate. As such, draft Policy SP2 does not positively or effectively respond to relevant cross-boundary strategic matters, including the significant unmet employment and housing need arising in the Black Country. Proposals to provide 30ha of employment land and 1,500 dwellings towards this unmet need is insufficient in quantitative and qualitative terms.</p> <p>Consider employment land provision and take-up will not be as successful as anticipated resulting in implications for achieving the objectives of the Shropshire Economic Growth Strategy, the West Midlands Strategic Economic Plan (SEP) and the West Midlands Local Industrial Strategy.</p> <p>Consider Land at Junction 3, close to RAF Cosford and at the heart of the M54 Corridor, should be identified as a strategic settlement. It would represent an effective and sustainable form of development; support identified economic development needs (including the Shropshire Economic Growth Strategy and West Midlands SEP); would be complementary to proposals at Shifnal; is well located to meet housing and employment needs arising in the Black Country, with direct access via M54 and Cosford Railway Station; and would have close links to businesses in the Black Country and major employment sites at i54 and T54.</p> <p>Consider exceptional circumstances exist to support the allocation of Land at Junction 3 (see A0137 B001).</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0137	B003	<p>Increase the housing and employment requirements to accommodate more unmet needs arising in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) - to at least 4,500 dwellings and at least 90ha employment land. Remove Land at Junction 3 from the Green Belt (370ha) and include it as a strategic settlement to achieve the additional cross-boundary housing and employment need (3,000 dwellings and 75ha employment land). The remaining 1,500 dwellings and 15ha of employment land could be accommodated on non-strategic sites at Bridgnorth and Shifnal.</p> <p>Land at Junction 3 also offers significant wider benefits as documented within the representation.</p> <p>To reflect this, appropriate changes should be made to draft Policy SP2, draft Schedule SP2.1; and paragraphs 3.7 and 3.18 of the proposed Explanation to draft Policy SP2. A new Policy (suggest reference S22) should also be included for the Strategic Settlement: Land to the north of Junction 3. The representation documents these suggested changes and provides an example of suggested new Policy S22.</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by an robust and proportionate site assessment process, which explains why sites are or are not proposed for allocation.</p>	No
A0137	B004	<p>Increase the housing and employment requirements to accommodate more unmet needs arising in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) - to at least 4,500 dwellings and at least 90ha employment land. Remove Land at Junction 3 from the Green Belt (370ha) and include it as a strategic settlement to achieve the additional cross-boundary housing and employment need (3,000 dwellings and 75ha employment land). The remaining 1,500 dwellings and 15ha of employment land could be accommodated on non-strategic sites at Bridgnorth and Shifnal.</p> <p>Land at Junction 3 also offers significant wider benefits as documented within the representation.</p> <p>To reflect this, appropriate changes should be made to draft Policy SP2, draft Schedule SP2.1; and paragraphs 3.7 and 3.18 of the proposed Explanation to draft Policy SP2. A new Policy (suggest reference S22) should also be included for the Strategic Settlement: Land to the north of Junction 3. The representation documents these suggested changes and provides an example of suggested new Policy S22.</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by an robust and proportionate site assessment process, which explains why sites are or are not proposed for allocation.</p>	No
A0137	B005	<p>Increase the housing and employment requirements to accommodate more unmet needs arising in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) - to at least 4,500 dwellings and at least 90ha employment land. Remove Land at Junction 3 from the Green Belt (370ha) and include it as a strategic settlement to achieve the additional cross-boundary housing and employment need (3,000 dwellings and 75ha employment land). The remaining 1,500 dwellings and 15ha of employment land could be accommodated on non-strategic sites at Bridgnorth and Shifnal.</p> <p>Land at Junction 3 also offers significant wider benefits as documented within the representation.</p> <p>To reflect this, appropriate changes should be made to draft Policy SP2, draft Schedule SP2.1; and paragraphs 3.7 and 3.18 of the proposed Explanation to draft Policy SP2. A new Policy (suggest reference S22) should also be included for the Strategic Settlement: Land to the north of Junction 3. The representation documents these suggested changes and provides an example of suggested new Policy S22.</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by an robust and proportionate site assessment process, which explains why sites are or are not proposed for allocation.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0137	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	No	No	No	Object to draft Policy SP11 and consider it renders the plan unsound on the basis that it does not facilitate the amended strategic approach proposed (see A0137 B001 and B002). In summary this involves increase the housing and employment requirements to accommodate more unmet needs arising in the Greater Birmingham and Black Country Housing Market Area and including Land at Junction 3 as a strategic settlement (for 3,000 dwellings and 75ha of employment land) to meet this additional contribution (plus reducing the reliance on other non-strategic employment sites to unmet cross-boundary needs to 15ha rather than 30ha). As such it does not positively or effectively respond to identified strategic priorities, notably of the Shropshire Economic Growth Strategy which seeks to deliver a 'step-change' in capacity and productivity of the local economy and to focus major employment development on strategic corridors. It also does not positively or effectively respond to relevant cross-boundary strategic matters which include the significant unmet needs of the Black Country.
A0137	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Table SP11.1 of SP11	No	No	No	Object to draft Policy SP11 and consider it renders the plan unsound on the basis that it does not facilitate the amended strategic approach proposed (see A0137 B001 and B002). In summary this involves increase the housing and employment requirements to accommodate more unmet needs arising in the Greater Birmingham and Black Country Housing Market Area and including Land at Junction 3 as a strategic settlement (for 3,000 dwellings and 75ha of employment land) to meet this additional contribution (plus reducing the reliance on other non-strategic employment sites to unmet cross-boundary needs to 15ha rather than 30ha). As such it does not positively or effectively respond to identified strategic priorities, notably of the Shropshire Economic Growth Strategy which seeks to deliver a 'step-change' in capacity and productivity of the local economy and to focus major employment development on strategic corridors. It also does not positively or effectively respond to relevant cross-boundary strategic matters which include the significant unmet needs of the Black Country.
A0137	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	No	No	No	Support draft Policy SP12 in terms of the aim of delivering sustainable economic growth and investment in the strategic and principal settlements, strategic corridors, new strategic settlements and sites and appropriate rural locations. However, would note objection to the proposed strategic approach in draft Policy SP2 and the omission of Land at J3 as a Strategic Settlement. Note that the explanation to draft Policies SP2 and SP14 confirm that 'strategic corridors' include the 'Eastern Belt M54/A5/A41/A464/A5 and A454/A458'. Note that the explanation to draft Policy SP12 states 'to facilitate sustainable economic growth, a 'step change' is needed in Shropshire's economic productivity... Land at Junction 3 is located on the M54 corridor and would deliver sustainable economic growth and support the 'step change' in the economy. The M54 corridor is the most prominent strategic corridor in Shropshire offering connectivity to the West Midlands.
A0137	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	No	No	No	Support draft Policy SP13. However, would note objection to the proposed strategic approach in draft Policy SP2 and the omission of Land at J3 as a Strategic Settlement. Consider Land at Junction 3 is required in the strategic supply of employment land in order to provide choice and competition in the market and meet an identified need in the logistics and manufacturing sector. It would support the Economic Growth Strategy and the growth aspirations of the wider area.
A0137	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	No	No	No	Support overall aims of draft Policy SP14. However, object to its current wording and consider it renders the draft Shropshire Local Plan unsound, on the basis that it does not identify that development on strategic corridors will be located on identified 'Strategic Settlements' in the draft Shropshire Local Plan. As such, it does not positively or effectively respond to identified strategic priorities, notably of the Shropshire Economic Growth Strategy which seeks to deliver a 'step-change' in capacity and productivity of the local economy and to focus major employment development on strategic corridors. It also does not positively or effectively respond to relevant cross-boundary strategic matters which include the significant unmet needs of the Black Country.
A0137	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	No	No	No	Support principle of draft Policy SP15, but object to current wording and consider it renders the draft Shropshire Local Plan unsound as it is not clearly written, contrary to para 16 of the National Planning Policy Framework (NPPF). For example, it is not clear how to interpret what is meant by 'meaningful' public consultation. In addition, sections (b) and (c) could easily be combined into one criteria.
A0137	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP16	No	No	No	Note that part of Land at Junction 3 falls within a Mineral Safeguarding Area for sand and gravel, as illustrated on Figure SP16.1. Draft Policy SP16 seeks to safeguard mineral resources. Mineral extraction opportunities associated with Land at Junction 3 would be investigated and where appropriate extraction works undertaken.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0137	B006	Remove Land at Junction 3 from the Green Belt (370ha) and include it as a strategic settlement to contribute to cross-boundary housing and employment need (3,000 dwellings and 75ha employment land - reducing contributions from the wider employment land supply to 15ha which could be accommodated on non-strategic sites at Bridgnorth and Shifnal). Land at Junction 3 offers significant wider benefits as documented within the representation. Include reference to land at Junction 3 as a strategic settlement within draft Policy SP11 and Table SP11.1. The representation documents these suggested changes.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0137	B007	Remove Land at Junction 3 from the Green Belt (370ha) and include it as a strategic settlement to contribute to cross-boundary housing and employment need (3,000 dwellings and 75ha employment land - reducing contributions from the wider employment land supply to 15ha which could be accommodated on non-strategic sites at Bridgnorth and Shifnal). Land at Junction 3 offers significant wider benefits as documented within the representation. Include reference to land at Junction 3 as a strategic settlement within draft Policy SP11 and Table SP11.1. The representation documents these suggested changes.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0137	B008	N/A	Noted.	No
A0137	B009	N/A	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. It is considered that an employment land provision at Junction 3 of the M54 Motorway is not required during this Plan period to 2038. The employment policies SP12, SP13 and SP14 would still be sufficiently flexible to accommodate such an outcome in the event that the circumstances determining the strategy for the Local Plan were to change considerably during the Plan period.	No
A0137	B010	Include reference to 'Strategic Settlements' within para 3 of draft Policy SP14. Consider Land at Junction 3 should be included as a Strategic Settlement in the draft Shropshire Local Plan and is located in the M54 Strategic Corridor.	It is considered that an employment land provision at Junction 3 of the M54 Motorway is not required during this Plan period to 2038. The employment policies SP12, SP13 and SP14 would still be sufficiently flexible to accommodate such an outcome in the event that the circumstances determining the strategy for the Local Plan were to change considerably during the Plan period. It is recognised that the term 'strategic settlements' is used within the Local Plan and SP14 criterion 3b and paragraph 3.141 should recognise this through the insertion of these words.	Yes
A0137	B011	Update para 1b. of draft Policy SP15 to include preparation in collaboration with 'the local community'. Delete para 1c. of draft Policy SP15 regarding meaningful public consultation. As it is unclear and can be addressed through the proposed change to para 1b.	Noted. Shropshire Council considers that it is appropriate to require Whole Estate Plans to be endorsed by Shropshire Council and used as a material planning consideration to have been subject to meaningful public consultation. Meaningful public consultation will depend on the nature, scope and context of the Whole Estate Plan.	No
A0137	B012	N/A	Noted.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0137	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	No	No	No	Support draft Policy DP3. There should be flexibility within the draft Shropshire Local Plan to respond to changing housing needs over the proposed Local Plan period. Consideration of individual site circumstances and the circumstances of a local area should be taken into account to determine the appropriate type of housing for development sites.
A0137	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3	No	No	No	Support overall aims of draft Policy S3. However would note that: -Bridgnorth is located on the A454/A458 transport corridor, but this corridor crucially does not benefit from strategic rail connections, unlike the M54 corridor. -The Bridgnorth Place Plan identifies the upgrade of the A458 / Wenlock Road junction, the upgrade of the A454 and the upgrade of the A442 as Priority A Projects, to increase capacity and safety in line with growth aspirations for the area. This will require the development of traffic modelling. Estimated costs and potential funding sources are currently unknown and to be confirmed. -Proposed allocations at Bridgnorth are small in scale and do not benefit from direct access and visibility to the strategic road network. -The ability of proposed development proposals at Bridgnorth to meet strategic employment needs or play a key role in meeting the unmet needs of the Black Country are limited. Rather, the proposed allocations would meet local needs only.
A0137	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15	No	No	No	Support overall aims of draft Policy S15. However would note the draft Policy and its supporting text indicates: -Shifnal will be a focus for investment, employment, housing and development on the M54/A5 Strategic Corridor and have a key role to play in providing homes, jobs, services and facilities to the Place Plan Area, other Green Belt communities and the M54/A5 strategic corridor. -New employment development is proposed to be delivered through a significant new investment opportunity on a proposed employment allocation (SHF018b and SHF018d), which will deliver 15.6ha net of development (single storey B1c, B2 and B8 uses 'serving the sub-regional supply chains on the A5, M54 and M6 corridors). -The proposed employment allocation SHF018b and SHF018d is within the Green Belt. Within the Green Belt Review undertaken to inform the draft Shropshire Local Plan the site is covered by two parcels, one has moderate-high harm the other high harm to the Green Belt if released. Shropshire Council considers exceptional circumstances exist to support this proposed allocation. -The strategy for Shifnal is to change the business investment and employment offer in its scale, quality, range of uses and choice of premises to enable Shifnal to function as a sustainable investment location in the M54 corridor, benefitting from access via Junction 3 and close proximity to the i54 major investment site. Proposed allocation SHF018b and SHF018d would be serviced from the A41/M54 Junction 3 but this would be via a minor rural route, Stanton Road. The draft Shropshire Local Plan acknowledges the need for a Strategic Transport Assessment to assess the effects of this development and cumulative growth of Shifnal on the Junction 3 of the M54 and the A41/Stanton Road junction. Distance from the strategic road network, lack of transport evidence and scale of the site (not sufficient to meet strategic regional and sub-regional need) demonstrates Shifnal is not likely to be able to make a 'significant contribution' to regional and sub-regional strategies. As such SHF018b and SHF018d is likely to meet local employment needs only. Land at Junction 3 would meet sub-regional and regional needs but, importantly, would also be complementary to the local employment offer at Shifnal and assist in addressing its jobs/homes balance to 2038 as required under the draft Shropshire Local Plan.
A0138	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	x	Yes	No	Yes	Draft Plan is "unsound" in its use of the criteria it is applying to Trefonen and its proposed Hub status. Para 5.41 which relaxes the need for Hubs to have both employment opportunities and peak time public transport is in direct contradiction to the Councils SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12 which seek to minimise car travel, increase usage of sustainable travel and reduce carbon emissions. Trefonen which has no significant employment opportunities or peak time public transport is the only proposed Hub settlement with neither of these key requirements. Trefonen has a full school, with no scope for expansion, and with existing housing provision meeting "identified local needs" for local people. Future housing needs can be provided for by Rural Exceptions Policies DP4, DP5, DP6 & DP7 "ascertained by reference to Shropshire Council's Home Point Housing Waiting List or by Right Homes Right Places or local Housing Needs Survey." The village would benefit from these small-scale developments of affordable housing over a period of time. Shropshire Council should respect our Village Design Statement 2016.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0137	B013	N/A	Noted.	No
A0137	B014	N/A	Noted. Shropshire Council is not proposing to identify specific sites to accommodate the proposed contribution to cross-boundary needs arising within the Black Country (1,500 dwellings and 30ha of employment land). Rather this is included within the proposed housing and employment land requirements subject to the proposed strategic approach for the level and distribution of development across Shropshire.	No
A0137	B015	N/A	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal. Whilst Shropshire Council has proposed to support the Black Country Authorities to meet their unmet needs in Shropshire, it is not proposed to identify specific sites to accommodate the intended contribution to cross-boundary needs arising within the Black Country (1,500 dwellings and 30ha of employment land). Rather this is included within the proposed housing and employment land requirements subject to the proposed strategic approach for the level and distribution of development across Shropshire.	No
A0138	B001	Trefonen should be removed as a Community Hub in Policy S14.2	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen.</p> <p>Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.</p> <p>As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.</p> <p>Shropshire Council also considers that the development strategy proposed for Trefonen, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable. It is noted that the proposed requirements in draft Policy S14.2, which applies to the proposed Community Hubs in the Oswestry Place Plan Area - including Trefonen, includes "development proposals will be expected to positively respond to policies and guidelines within any relevant community-led plans and local needs."</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0139	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	x	Yes	No	Yes	Draft Plan is "unsound" in its use of the criteria it is applying to Trefonen and its proposed Hub status. Para 5.41 which relaxes the need for Hubs to have both employment opportunities and peak time public transport is in direct contradiction to the Councils SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12 which seek to minimise car travel, increase usage of sustainable travel and reduce carbon emissions. Trefonen which has no significant employment opportunities or peak time public transport is the only proposed Hub settlement with neither of these key requirements. Trefonen has a full school, with no scope for expansion, and with existing housing provision meeting "identified local needs" for local people. Future housing needs can be provided for by Rural Exceptions Policies DP4, DP5, DP6 & DP7 "ascertained by reference to Shropshire Council's Home Point Housing Waiting List or by Right Homes Right Places or local Housing Needs Survey." The village would benefit from these small-scale developments of affordable housing over a period of time. Shropshire Council should respect our Village Design Statement 2016.
A0140	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0140	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0140	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0139	B001	Trefonen should be removed as a Community Hub in Policy S14.2	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen.</p> <p>Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.</p> <p>As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.</p> <p>Shropshire Council also considers that the development strategy proposed for Trefonen, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable. It is noted that the proposed requirements in draft Policy S14.2, which applies to the proposed Community Hubs in the Oswestry Place Plan Area - including Trefonen, includes "development proposals will be expected to positively respond to policies and guidelines within any relevant community-led plans and local needs."</p>	No
A0140	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0140	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0140	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself.</p> <p>The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable.</p> <p>The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page.</p> <p>Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0140	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth.</p> <p>Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0140	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>
A0141	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0141	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>
A0141	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from ‘inappropriate development’. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is ‘inappropriate development’, unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a.</p> <p>Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites.</p> <p>Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating ‘very special circumstances’.</p> <p>If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0140	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0140	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0141	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0141	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0141	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0141	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0141	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>
A0142	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0142	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>
A0142	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from ‘inappropriate development’. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is ‘inappropriate development’, unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a.</p> <p>Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites.</p> <p>Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating ‘very special circumstances’.</p> <p>If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0141	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0141	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0142	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0142	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0142	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0142	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0142	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>
A0143	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0143	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>
A0143	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from ‘inappropriate development’. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is ‘inappropriate development’, unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a.</p> <p>Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites.</p> <p>Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating ‘very special circumstances’.</p> <p>If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0142	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0142	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0143	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0143	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0143	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0143	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0143	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0144	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP30 and DP30.1	Yes	No	Yes	Table DP30.1 (supporting draft Policy DP30) provides information explaining why no additional allocations for sand and gravel are proposed, however figures for permitted reserves of sand and gravel are not consistent with the minerals technical background report - Table DP30.1 states 13.5 Mt, whilst the minerals technical background states 10.93Mt (19% lower). Regarding the 10.5Mt windfall allowance, this figure is very large in comparison with permitted reserves, and may need to be adjusted to 13.07 Mt if permitted reserves are adjusted back to 10.93Mt. 70% of permitted reserves are already stated to be contained within sites not worked for at least 5 years. Though the operators of 2 have stated an intention to recommence production during the Plan period, the reliability of the anticipated supply must be questioned. Also unclear whether likely windfall reserves are associated with sites that accord with the Plan, or to what extent they can be relied upon to meet production guidelines or required landbank.
A0144	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP30 (1)	Yes	No	Yes	Point 1 of draft Policy DP30 states the supply of sand and gravel during the Plan period should be provided in the first instance from existing permitted sites and then from the development of mineral working at the saved SAMDev Plan mineral allocations identified within Appendix 2 of this document and identified on the Proposals Map. It is considered that this policy provides a spatial strategy for the provision of sand and gravel that should be included in draft Policy SP16.
A0144	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP16	Yes	No	Yes	Point 3 of draft Policy SP16 explains Shropshire Council plans to maintain a productive capacity for aggregates based on the 3 year average production in 2018 plus 20%. Para 207 of the National Planning Policy Framework (NPPF) requires that “Minerals planning authorities should plan for a steady and adequate supply of aggregates by: (a) preparing an annual Local Aggregate Assessment, either individually or jointly, to forecast future demand, based on a rolling average of 10 years’ sales data and other relevant local information, and an assessment of all supply options (including marine dredged, secondary and recycled sources)”. In this case, the other relevant local information is explained under paragraph 3.156 and 3.157. Consider that to be consistent with national policy, level of provision should be based on 10 years sales average of 0.68 million tonnes and the adjustment based on “other relevant local information” is explained thereafter. The amount of the increased adjustment is possibly sound but should be justified on robust evidence e.g. rather than using a 20% uplift factor on the basis of the increased demand demonstrated by the most recent 3 years sales average, the increase needs to be assessed on the need for replacement production capacity required (noting in 2008 there were 7 operational sites and a recent permission for a new site will provide for capacity that could not be found in a neighbouring area) and any significant future increases in demand that can be forecast with reasonable certainty (refer to Para: 084 Reference ID: 27-084-20140306 of the National Planning Practice Guidance).
A0144	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP16(4)	Yes	No	Yes	Point 4 of draft Policy SP16 refers to ‘broad locations’, should this be replaced with ‘saved allocated sites’? This policy appears to be largely duplicated by point 2 of draft Policy DP30 except that the latter also allows flexibility where a proposal can be demonstrated to meet an unmet need. Care will also be needed to ensure that these draft policies do not unduly restrict the potential for windfall sites, on which the plan depends, to come forward.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0143	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0143	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0144	B001	The figure used for permitted reserves should be 10.93Mt as of 01.01.19 rather than 13.5Mt (see minerals technical background report) and confirmation should be also provided of the amount of permitted reserves anticipated to be worked during the Plan period or in sustaining a 7 year landbank at the end of the Plan period. Evidence should be provided to support the anticipated 10.5Mt contribution from windfall sites that accord with the Plan.	13.5mt is correct and based on returns to AM2018. Draft returns for AM2019 suggest an improvement on the previous year's reserves and production performance. Whilst it is acknowledged that the windfall allowance is high, it is based on the planned extension of existing sites (which accord with the Plan), with the exception of a single site which is subject to a current planning application (recommended for approval). As such, no change is proposed.	No
A0144	B002	Point 1 of draft Policy DP30 should be included within draft Policy SP16, as it provides a spatial strategy for the supply of sand and gravel.	Draft Policies SP16 and DP30 are intended to be complementary. As such a minor modification is proposed to para 4 of draft Policy SP16 to clarify this matter, as follows: "Only supporting proposals for sand and gravel working outside saved SAMDev Plan mineral allocations identified within Appendix 2 of this document and identified on the Proposals Map and existing permitted reserves, where this would be consistent with the requirements of Policy DP30;"	Yes
A0144	B003	To be consistent with national policy, the level of provision of aggregates should be based on the 10 years sales average of 0.68 million tonnes and that any adjustment based on the "other relevant local information" should be explained thereafter.	Consider the approach as proposed is sound in that it reflects local circumstances and well-rehearsed industry concerns that planning on the basis of a 10 year average does not properly reflect local circumstances in the West Midlands. The rationale for the proposed approach is clearly identified as part of the LAA / Minerals Technical Background report (Para 17) and paragraph 3.157 of the supporting text to draft Policy SP16. As such, no change is proposed.	No
A0144	B004	Replace 'broad locations' with 'saved allocated sites' Clarify duplication between SP16 point 4 and DP 30 point 2.	The concern raised is noted, draft Policies SP16 and DP30 are intended to be complementary. As such a minor modification is proposed to para 4 of draft Policy SP16 to clarify this matter, as follows: "Only supporting proposals for sand and gravel working outside saved SAMDev Plan mineral allocations identified within Appendix 2 of this document and identified on the Proposals Map and existing permitted reserves, where this would be consistent with the requirements of Policy DP30;" A minor modification is also proposed regarding reference to broad locations, which should reference saved SAMDev Plan mineral allocations.	Yes

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0145	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0145	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0145	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from ‘inappropriate development’. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is ‘inappropriate development’, unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating ‘very special circumstances’. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0145	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0145	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0145	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0145	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0145	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0145	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0145	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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A0146	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Not specified	Not Specified	Not Specified	Not Specified	<p>Site adjacent Shifnal and should be brought forward as an allocation, for the medium and long-term needs of Shifnal. It has been informed by a comprehensive suite of technical assessments ( included as appendices) that appraise the site with regards to landscape, ecology, heritage, transport and access, flood risk and drainage to demonstrate that the site is sustainable, deliverable and free from constraints for the purpose of development. A unique &amp; valuable benefit is the delivery of new link road around the south and west of Shifnal &amp; this is the natural direction for future growth.</p> <p>Confirm that whilst land east of Park Lane is controlled by Miller while land west of Park Lane is controlled by Wallace both parties working jointly to deliver a sustainable extension to Shifnal that will deliver housing, a new link road around the south-west of Shifnal together with community facilities and new public open space that will benefit the existing residents. The masterplan for the site shows how the site can deliver approximately 1,265 new homes and associated infrastructure and community facilities; and how the site integrates with the existing settlement. The masterplan has been informed by site technical assessments (Appendices) relating to environmental considerations, heritage designations, flooding and drainage, landscape, open space and ecology, and phasing of new homes.</p> <p>Shifnal is a recognised as sustainable as a key centre. The site lies within the highly connected and regionally important M54 Corridor, close to main employment centres, by road and by train with the train station is within walking distance of the site.</p> <p>It is ideally placed to help address development pressure in Shifnal as well as the Black Country &amp; will make a positive contribution to housing requirements of both. Higher levels of housing in the plan period are prudent in the context of the significant housing need pressures in Shifnal and the M54 Corridor. Better to locate housing close to the source of high demand, rather than displace it elsewhere in Shropshire. Reducing carbon emissions by actively reducing commuting distances should be part of Council's approach to tackling the threat of climate change. The proposals also respond positively to the important matter of climate change by: Locating homes close to a wide range of jobs &amp; within walking distance of a railway station schools, shops and community facilities; providing carbon-friendly houses; improving the Wesley Brook's environmental capacity &amp; developing sufficient 'critical mass' of new housing to enable significant upgrades in infrastructure that will benefit all residents in Shifnal.</p> <p>Population growth from new housing provision will offer the opportunity to indirectly support the wider growth of the local economy including retail and other services supported by good social infrastructure.</p> <p>The proposals meet the 'exceptional circumstances' necessary to release land from the Green Belt, providing essential space to meet Shifnal's needs for sustainable growth. It will also deliver environmental and access improvements to remaining Green Belt in accordance with national policy. Site has been proposed to be released from the Green Belt and safeguarded but compelling case to allocate the site in the plan, for the medium and long-term needs of Shifnal as evidenced by submitted supporting information. Evidence ref landscape, ecology, heritage, transport and access, flood risk and drainage demonstrates that the site is deliverable and free from constraints.</p> <p>The entire site is immediately adjacent to the existing settlement of Shifnal &amp; site location &amp; context plans are provided in the response. Response sets out case for and emerging proposals for sites as a sustainable extension to Shifnal. Also response ( including Appendix 1) sets out case for: Green Belt release; summary of the socio-economic benefits; vision &amp; draft masterplan (included) ; phasing proposals ( included with phasing plan) ; Alignment of housing delivery with new highways infrastructure.</p> <p>The site is well related to the existing urban area &amp; the site is below ridge of higher land to the west of the town which creates a strong visual barrier between Shifnal &amp; Telford. Areas of woodland, hedgerows and water features e.g. Wesley Brook create natural boundaries and/or visual barriers to help to define the setting of the site. Maps of context, topography and illustrative landscape strategy are provided. The Illustrative Masterplan takes into account the landscape setting of the site and the extent of development responds to the 'development envelope' that can accommodate built form and infrastructure whilst also establishing a robust &amp; appropriately enhanced green infrastructure framework. The masterplan uses &amp; retains existing features to define &amp; screen the development.</p> <p>Impact of long-term restraint of Shifnal's housing growth, resulted in significant demand for housing in the town reflected in significant residential expansion from 2016 with all SAMDev Plan allocations completed or with planning permission. Shifnal has high market demand and can deliver housing growth more effectively than most settlements in Shropshire. Response sets out detail of Shifnal housing market context including historic delivery; demography; sustainability of location &amp; opportunity for sustainable growth; affordability &amp; need &amp; economic and social benefits.</p> <p>Housing market evidence strongly demonstrates a case for a higher level of housing delivery and confirms strong links to job opportunities in Telford and in the Black Country, with good public transport links along the M54 Corridor( illustrated), a strategic corridor with role in driving economic prosperity identified in M54 Growth Corridor – Strategic Options Study 2019, including strategic allocations. The submission sets out further contextual information re the role &amp; significance of the M54 corridor, including recognition by the Draft Plan the importance of this strategic corridor, and that it thus seeks to focus major economic growth and employment development along it. To support this the Plan the plan is seeking to release Green Belt land and allocate for employment. Also closeness of Cosford growth and its implications need to be taken into account (illustrative plan provided) . The growth in employment within the strategic corridor at Shifnal, RAF Cosford and elsewhere, will inevitably increase housing demand in Shifnal and may well be needed before the end of the plan period.</p>



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A0146	B001	Site should be allocated as a sustainable extension to Shifnal	<p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038. Whilst Shropshire Council has proposed to support the Black Country Authorities to meet their unmet needs in Shropshire, it is not proposed to identify specific sites to accommodate the intended contribution to cross-boundary needs arising within the Black Country (1,500 dwellings and 30ha of employment land). Rather this is included within the proposed housing and employment land requirements subject to the proposed strategic approach for the level and distribution of development across Shropshire.</p>	No

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A0146	B001 Cont'd						<p>In recognition of development pressures in the east of Shropshire, the Pre-Submission Draft Plan safeguards land to meet longer term development needs and the Plan identifies delivery of a range of expected benefits enabled by a new neighbourhood community including: highway &amp; other infrastructure improvements and links ; services &amp; facilities and open space enhancements etc. The response sets out required infrastructure improvements that development on the site could contribute to. It is considered that to provide choice and better balance in the town, land to the south and west of Shifnal is the natural direction for future growth. Support for the Green Belt release which should be directed to the most sustainable settlements such as Shifnal, with a range of services &amp; facilities and rail transport (A services and facilities plan is included). Release of Green Belt in this location is wholly in accordance with the NPPF's requirement to promote sustainable patterns of development &amp; will secure the town's long-term future. The contribution of the site to the Green Belt has been appraised (Wallace and Miller Appendix 1 and 3) The assessments conclude that development of the site would only cause low-moderate harm overall and the location is entirely logical to be released from the Green Belt.</p> <p>The delivery of around 200 dwellings per annum in Shifnal since 2016 shows that this is a location in which development is quickly delivered but Pre-Submission Draft Plan seeks to provide very few new homes from around 2025. No reasons why the site could not come forward as an allocation to provide much needed homes and infrastructure. The site can be delivered in a chronological way that aligns delivery of new housing with new infrastructure &amp; detailed phasing strategy is set out (including plan). Wallace and Miller have a successful track record of delivering sites of this nature. Comprehensive technical assessments undertaken for the site do not identify any issues or constraints to delivery.</p> <p>Acknowledging community identified traffic concerns it is considered that a major benefit is that the development of this site will not exacerbate traffic conditions in the town centre &amp; will deliver a new link road around the south and west of Shifnal( plan provided) on a phased basis over the life of the development. The through road from the A464 Wolverhampton Road to Park Lane serving the site has the potential to offer wider strategic benefits to Shifnal. It would form the first section of a local link road, ultimately connecting to the A4169, with the potential to connect to the A464 Priorslee Road. Link road will enable a significant proportion of through traffic to be removed from the town centre which could be combined with already proposed improvement to the Five-Ways roundabout &amp; Innage Road on-street parking/waiting control. The link road will provide an alternative route that by-passes the town and will ensure that the development does not generate any further pressure on key junctions in the town. There are no other prospects for any similar intervention to be delivered from development elsewhere in Shifnal.</p> <p>The site has good connectivity with the wider settlement by sustainable transport modes &amp; is also ideally located to encourage travel by sustainable modes as described in the response &amp; Appendices. The development of the site provides an opportunity to assist in easing current traffic conditions close to (and knock on impacts beyond) St Andrews Primary School on Park Lane with the provision of a pick-up and drop-off facility as described.</p> <p>The release of land for development creates opportunities for improved vehicle movements to and from Park Lane, as detailed in the Phasing Strategy and Access Arrangements report(Appendix) which also sets out further information on the site access proposals set out in the response(including phasing and indicative masterplans) .</p> <p>In order to address the requirement for additional capacity at St. Andrew's Primary School the masterplan includes provision for new school infrastructure if required.</p> <p>The current Green Belt restricts opportunities for Shifnal's retail offer to be increased. The town currently lacks a large supermarket and the site offers an opportunity for the town to attract new retail such as a supermarket, reducing expenditure leakage and travel.</p> <p>The site provides an opportunity to deliver a generous area of semi-natural new public open space along the Wesley Brook ( shown on masterplan) with associated biodiversity enhancements and potential to provide new footpaths for improved resident access (as described) with ecological considerations detailed in appendix 1 &amp; 1.3 ) .</p> <p>The proposals incorporate measures to address flood risk and drainage. Detailed proposals are contained in the technical assessments contained at Appendix 1 and 3.</p> <p>Heritage and archaeology assessments undertaken (Appendix 1 and 3) show no heritage constraints that would prevent site allocation of the site. Designated and/or non- designated assets within or within the vicinity of the site are capable of being preserved through the detailed design and layout of the proposed development.</p> <p>The NPPF requires Local Plans to make sufficient provision to meet all its development needs, including making provision for infrastructure, community facilities and natural environment enhancement. The proposed sustainable strategic extension achieves this &amp; would help Shropshire Council deliver NPPF requirements. Response cross references other submitted representations that the housing requirement for Shropshire may increase significantly when taking into account likely revision to standard method for calculating local housing needs, and level of Black Country's unmet housing needs. Highlight NPPF strong support for setting a housing requirement which is higher than that implied as a 'minimum' level through the standard method. A higher target recognising role &amp; economic ambitions for the M54 Growth Corridor &amp; addressing the consequences of historic under provision; meeting the significant housing need pressures identified in the Greater Birmingham and Black Country housing market area in the area closest to their source, avoids displacing their housing demand pressures onto other parts of Shropshire; delivery of new housing in the Shifnal will address affordability ratio issue ; Shifnal's growth will reinforce its vitality and sustainability, helping address ageing population profile that is a consequence of previous constraints on housing in the town and worsening housing affordability. The growth of the working-age population represents an opportunity to sustainably support the local economy and community vitality.</p>

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A0146	B001 Further Cont'd						<p>Key community benefits of the site: a range of homes to meet local and regional needs; attracting younger families to Shifnal &amp; addressing ageing demographic; New road infrastructure ; St Andrew's Primary School parents' access and drop off; new school site provision and land for new retail facilities, and play areas; • Significant investment in the town, with direct and indirect economic benefits; support from new households for shops and services in Shifnal; improved settlement edge with a landscaped buffer; and, new public park along the Wesley Brook .</p> <p>Delivery of 1295 new homes with resulting CIL around £7m &amp; the proposals provides co-ordinated investment in Shifnal of around £120 million. Estimated the site will create around 335 indirect &amp; direct local jobs per annum and generate economic spin-offs in the region of £341 million.</p> <p>The site also makes provision to deliver new public open space, health centre, school and other community facilities. The initial phases of the development can commence within the early part of the plan period, if required.</p> <p>The site has no technical constraints, has strong market demand and is highly deliverable and can deliver a quality scheme, together with infrastructure that contributes to the local community's needs. The site will help support the continued economic vitality of the town, its services and environment, contributing to the wider sustainability of Shropshire and the wider sub-region.</p> <p>Submitted supporting appendices:</p> <p>Appendix 1 – Development Framework Document provides supporting detail in respect of elements summarised and summaries of technical assessments referencing – sustainability appraisal; landscape assessment; Green Belt assessment &amp; release, heritage, ecology, drainage &amp; flood risk, transport &amp; access; economic &amp; community benefit elements; masterplan &amp; phasing</p> <p>Apdx 1.1.1 preliminary landscape and visual assessment</p> <p>Apdx 1.1.2 Historic Environment Assessment</p> <p>Apdx 1.1.3 Ecological Assessment</p> <p>Apdx 1.1.4 FRA</p> <p>Apdx 1.4 Phasing Strategy &amp; access arrangements joint Wallace &amp; Miller site</p> <p>Wallace Site (Safeguarded land SW of Shifnal) includes illustrative plans &amp; photographs:</p> <p>As well as the joint submission, a separate Lodge Hill vision framework/illustrative masterplan (Appendix to this representation) &amp; consideration of site against technical assessments has been prepared specifically for the Wallace site (informed by extensive supporting assessments including a Preliminary Landscape and Visual Appraisal (2020, Pegasus Group), Transport &amp; Access Note, Flood Risk Assessment (2020, SWECO), Ecological Appraisal (2020, FPCR) and Historic Environment Desk-Based Assessment (2020, Nexus) which also form Appendices to this representation), demonstrating consideration of opportunities/constraints, how the site could be delivered. Submission further seeks to demonstrate that site is suitable, sustainable and deliverable and should be allocated as a sustainable extension capable of accommodating sustainable residential development to meet medium and long-term housing needs as well as delivering a new link road and community facilities. Site Plan and phasing provided for the site with phases to deliver up to 1,100 new home.</p> <p>Consider the site would represent a logical expansion of the settlement Shifnal &amp; site location &amp; context plans are provided in the response. The site has a 'good' overall score in the Council's Sustainability Appraisal &amp; is considered to be a highly sustainable location. Confirms that the site has no significant constraints and the site will not materially reduce the gap between Shifnal and Telford &amp; the proposed development will provide an improved landscape buffer with the remaining Green Belt.</p> <p>A bespoke Green Belt assessment for the site is provided. Exceptional circumstances for release are set out &amp; potential for Green Belt environmental improvements identified in Appendix 1 . A landscape led approach can ensure that a scheme embeds mitigation in the overarching design principles and recognises the local landscape character. On the basis of the published LVSS and the more detailed PLVA, the site is considered to be of low to medium visual and landscape sensitivity to new residential development and is suitable and preferable for a residentially led masterplan.</p> <p>Miller Site Specific Rep as set out in :</p> <p>Apdx 1.2 Vision Framework Miller site (includes illustrative plans &amp; photographs)</p> <p>Apdx 1.3 Miller Site ( Land East of Park Lane) – Consideration against technical evidence (including Evidence as appendices) March 2020</p> <p>Apdx 1.4 Phasing Strategy &amp; access arrangements joint Wallace &amp; Miller site Sept 20</p> <p>As well as the joint submission ,a vision framework/illustrative masterplan (Appendix to this representation) &amp; consideration of site against technical assessments has been prepared specifically for the Miller site (informed by extensive supporting assessments including a Landscape Visual Assessment, Transport &amp; Access Note, Flood Risk &amp; Drainage Assessment, Preliminary Ecological Appraisal and Initial Heritage Assessment which also form Appendices to this representation), demonstrating consideration of opportunities/constraints, how the site could be delivered. Submitted Vision Document further seeks to demonstrate that land east of Park Lane is suitable, sustainable and deliverable and should be allocated as capable of accommodating sustainable residential development to meet the clear, identified need for new housing within Shropshire. The site is subject to no technical constraints which cannot be appropriately mitigated. The site would represent a logical expansion of the settlement Shifnal &amp; site location &amp; context plans are provided in the response.</p> <p>Response seeks to demonstrate that land east of Park Lane (identified on Plan) is suitable, sustainable and deliverable and should be allocated for future development providing an opportunity close to the town centre with its</p>

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A0146	B001 Further Cont'd						<p>Allocation of the site for housing development would comply with the key objectives of the Framework as outlined including presumption in favour of sustainable development and housing, green belt; sustainable transport, natural and historic environment and other relevant NPPF policies. National &amp; local policy directs new housing development to sustainable locations. Suitability of Shifnal to accommodate additional development has been recognised by Key Centre status. Response sets out site context highlighting excellent accessibility &amp; proximity of employment. Shifnal is a very sustainable location with good access to existing public transport &amp; a wide range of facilities and services as detailed. A series of technical studies have been undertaken to inform the emerging proposals for the site and support its allocation for residential development.</p> <p>Landscape and visual analysis has been carried out which identifies the likely landscape and visual opportunities and constraints which influence the site's ability to accommodate residential development. The site is set within a relatively enclosed location, close to the southern fringe of Shifnal. Due to the site's location within this enclosed landscape it is considered appropriate for development in landscape and visual terms. The containment of the site provides the potential for successfully integrating development within the landscape and providing a new defensible settlement boundary. Notably the visibility of the site in the wider landscape is reduced by its topography and the influence of surrounding mature vegetation. Identified design principles have been incorporated into the emerging layout to help reduce the 'impact of change' on the area's landscape. Overall, the landscape is considered to be of medium landscape and visual sensitivity and to have a moderate capacity to accommodate development &amp; to be appropriate for development in landscape and visual terms. .</p> <p>No impacts to any statutory wildlife sites are envisaged and other species and ecological considerations are identified &amp; addressed as set out. With the exception of boundary habitats, the site is of low ecological value &amp; mitigation measures can be incorporated to ensure no significant impacts. Illustrative Site Masterplan for identifies positive design measures &amp; there is potential to deliver a net biodiversity gain across the site .</p> <p>Arrangements for access, including primary &amp; secondary access, footway &amp; cycleway provision &amp; sustainable transport opportunities are set out.</p> <p>Flood Risk Assessment illustrates no constraints to the development of the site for residential development The site is located wholly within Flood Zone 1 and other forms of flood risk have been considered and appropriate Surface Water Management &amp; application of Sustainable Urban Drainage Systems (SuDS) is proposed as set out in detail .</p> <p>An Initial Heritage Appraisal sets out the key heritage considerations to be taken into account in developing the site including consideration of the grade II listed The Terrace. Recommendations are made to ensure new development responds to the significance of the listed building.</p> <p>Response sets out development framework for the site identifying constraints &amp; opportunities, access &amp; movement, SUDs, open space etc arrangements which is developed into the concept plan provided . Through a robust assessment of the site's policy, spatial and environmental context, it has been demonstrated that the site is suitable and appropriate for future development &amp; a sensitive, high quality development which responds to the attributes of the site can be achieved.</p> <p>The site would deliver a high quality &amp; sensitive residential development within an attractive landscape setting that would bring a number of benefits to the town, including: delivering 175- 200 homes to provide new market and affordable housing that can address local need through type and tenure and provide mix and choice with up to 33% affordable homes; strong landscape framework comprising new areas of open space; Promoting Healthy Communities as the adjacent to a highly sustainable settlement and in close proximity to existing community facilities and services which are easily accessible by foot; the proposed development will provide a boost to the local economy through new households giving additional expenditure in the local economy.</p> <p>If the site is allocated a comprehensive engagement strategy will be undertaken with stakeholders and the local community.</p> <p>Committed to early delivery of the site via the planning application process.</p> <p>Development of the site will support the five-year supply and contribute towards the delivery of the Council's economic growth strategy and sustainable communities</p> <p>Potential for site to be delivered independently of Wallace land site</p> <p>Further detailed submission is provided also considering the Wallace site against technical evidence prepared (Landscape and Green Belt; Transport and Accessibility; Heritage; Ecology; Flood Risk and Drainage reports which are included as appendices) . The submission reviews the Council's Green Belt Assessment noting that it identifies the 's site as an 'opportunity area' &amp; that it is already proposed for safeguarding , the Council's evidence demonstrating that it, together with preferred housing allocation SHF022 and part SHRO23, are located in the least harmful direction of growth surrounding Shifnal. The site specific Landscape &amp; Visual Assessment identifies that the site's natural boundaries will provide for a new robust Green Belt boundary supporting removal of the site from the Green Belt, as well as identifying opportunities for site design.</p> <p>Transport assessment (Appendix) considers local highway network, existing public transport and active travel opportunities to and from &amp; within the vicinity of the site. Also, potential new accesses into the site from the A464 and Park Lane respectfully. The proposals demonstrate that safe access can be provided, on its own or in combination with promoted Wallace land to the west of Shifnal.</p> <p>Masterplan responds to the site's immediate environs and technical evidence base meaning that it will be 'deliverable' in accordance with the NPPF i.e. suitable, available ( promoted by developers on behalf of landowners) &amp; achievable (based on development expertise of promoter) . Consider that Shifnal should see a higher level of growth than was directed to it at 'Preferred Options.</p>

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0147	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Not Specified	Not Specified	Not Specified	Not Specified	<p>As well as the joint submission with Miller Homes ( Summarised under response Ref A0146) , a separate Lodge Hill vision framework/illustrative masterplan (Lodge hill extension Development Framework Document (Sept 20) &amp; consideration of site against technical assessments has been prepared specifically for the Lodge Hill site (informed by extensive supporting assessments including a Preliminary Landscape and Visual Appraisal (2020, Pegasus Group), Flood Risk Assessment (2020, SWECO), Ecological Appraisal (2020, FPCR) and Historic Environment Desk-Based Assessment (2020, Nexus) which also form Appendices to this representation), demonstrating consideration of opportunities/constraints, how the site could be delivered. It is concluded that the technical studies that have been undertaken demonstrate that there are no constraints that would prevent the allocation of the site.</p> <p>Submission further seeks to demonstrate that site is suitable, sustainable and deliverable and should be allocated as a sustainable extension capable of accommodating sustainable residential development to meet medium and long-term housing needs as well as delivering a new link road and community facilities. Site Plan and phasing provided for the site with phases to deliver up to 1,100 new home. A range of socio-economic benefits are identified.</p> <p>Consider the site would represent a logical expansion of the settlement Shifnal &amp; site location &amp; context plans are provided in the response. The is located in the M54 growth corridor &amp; able to contribute to the Council's economic and demographic strategies. The site has a 'good' overall score in the Council's Sustainability Appraisal &amp; is a highly sustainable location with proximity to large areas of employment. Confirms that the site has no significant constraints and the site will not materially reduce the gap between Shifnal and Telford. The need for sustainable development in the M54 growth corridor contributes to the case for exceptional circumstances for the release of the Green Belt.</p> <p>A bespoke Green Belt assessment for the site is provided. Exceptional circumstances for release are set out &amp; potential for Green Belt environmental improvements are identified. A landscape led approach can ensure that a scheme embeds mitigation in the overarching design principles and recognises the local landscape character. On the basis of the published LVSS and the more detailed PLVA, the site is considered to be of low to medium visual and landscape sensitivity to new residential development and is suitable and preferable for a residentially led masterplan. New landscaped edge will be created to form a robust green edge between Shifnal and the Green Belt. Together with improved public access to greenspace, this will improve the environmental character of the Green Belt.</p> <p>It is considered that a major benefit is that the development of this site will not exacerbate traffic conditions in the town centre &amp; will deliver a new link road around the south and west of Shifnal( plan provided) on a phased basis over the life of the development. The through road from the A464 Wolverhampton Road to Park Lane serving the site has the potential to offer wider strategic benefits to Shifnal. It would form the first section of a local link road, ultimately connecting to the A4169, with the potential to connect to the A464 Priorslee Road. Link road will enable a significant proportion of through traffic to be removed from the town centre which could be combined with already proposed improvement to the Five-Ways roundabout &amp; Innage Road on-street parking/waiting control. The link road will provide an alternative route that by-passes the town and will ensure that the development does not generate any further pressure on key junctions in the town. The development of the site could ease current traffic congestion conditions associated with St Andrews Primary School by also including provision of a pick-up and drop-off . The introduction of the roundabout for access and improvements to footways would act as a gateway feature at the entrance to the town from the southwest. This will act as a traffic calming feature facilitating a reduction in the speed limit.</p> <p>The site has good connectivity with the wider settlement by sustainable transport modes &amp; is also ideally located to encourage travel by sustainable modes as described in the response.</p> <p>An Illustrative Masterplan and potential phasing to deliver is provided to deliver approximately 1,100 new homes, in conjunction with public open space &amp; new transport infrastructure and community facilities as required in the early part of the plan period. The masterplan has been informed by site technical assessments relating to environmental considerations, heritage designations, flooding and drainage, landscape, open space and ecology, and phasing of new homes.</p> <p>Delivery of new housing in the Shifnal will address historic under provision and provide : a range of homes to meet long term housing needs address affordability ratio issue ; provide choice of well designed energy efficient homes; Shifnal's growth will reinforce sustainability, helping address ageing population profile through growth of the working-age population.</p> <p>Appendix also provides an analysis of the housing requirement and Five Year land Supply. It is considered that using Governments proposed revised standard method that there will be a need for the local plan to address under provision and calculations of five-year requirement are provided.</p> <p>Supplied Appendices: Appendix preliminary landscape and visual assessment Lodge hill; Appendix Historic Environment Assessment Lodge hill; Appendix Ecological Assessment – Lodge hill; Appendix FRA- Lodge Hill; Appendix – Reg 18 representations; Appendix - 5-year land supply submission.</p>
A0148	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	Support higher growth option, but more housing than suggested is needed due to unmet housing need (1,500 with Black Country considered insufficient), low affordable numbers, need to support Economic Growth Strategy, the annual rate of housing delivery does not include any flexibility or headroom, the trajectory fails to set out quantified rates of anticipated delivery from site allocations. The Council's implicit recognition that its local housing need figure is a minimum starting point is welcomed, however it is unclear as to how a figure of 3,406 dwellings to provide flexibility has been derived and specifically to what needs it accommodates.
A0148	B002	Sustainability Appraisal	Chapter 5	Not Specified	Not Specified	Not Specified	Chapter Five confirms that three Housing Requirement Options were assessed against the respective Sustainability Objectives. The approach is considered flawed on two grounds: the total number of dwellings tested in the 'Option 3: High Growth' scenario does not reflect the 30,800 dwellings identified in the DSLP and the annualised housing requirement for each of the three options suggests a 20-year plan period has been utilised, as opposed to a 22-year plan period (2016-2038) as proposed in the DSLP.
A0148	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Not Specified	Not Specified	Not Specified	Support the encouragement for the use of electric and hybrid vehicles but consider this should be secured through a national standardised approach implemented through the Building Regulations. This will ensure a consistent approach to future proofing the housing stock. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and considered a proposal for one charge point per dwelling rather than per parking space. L&Q Estates endorses the Council's requirement for development to support the transition to a zero-carbon economy and considers that its land interests at Shifnal would look to support this transition to a zero-carbon economy.
A0148	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Not Specified	Not Specified	Not Specified	Support for this policy. Our land interests at Shifnal are well situated to accommodate residential development, as new dwellings would be located close to existing green spaces and the proposed site layout will promote walking and cycling. Additionally, the proposed development is well located to existing and future planned employment opportunities, community facilities and transport connections, and should therefore be considered favourably in the context of Policy SP6(3).

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0147	B001	Site should be allocated for housing.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038. Whilst Shropshire Council has proposed to support the Black Country Authorities to meet their unmet needs in Shropshire, it is not proposed to identify specific sites to accommodate the intended contribution to cross-boundary needs arising within the Black Country (1,500 dwellings and 30ha of employment land). Rather this is included within the proposed housing and employment land requirements subject to the proposed strategic approach for the level and distribution of development across Shropshire.	No
A0148	B001	Further evidence is required to robustly demonstrate whether an uplift of 4,906 dwellings is sufficient to address unmet housing need, affordable housing and infrastructure and economic growth. Recommend the Council re-run the appraisal of housing growth options through the SA in order to reasonably conclude on a preferred option which has been robustly tested.	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. The proposed housing requirement has been informed by the extensive evidence base prepared to inform the Local Plan Review, consultation undertaken as part of the Local Plan Review process and Sustainability Appraisal. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0148	B002	L&Q Estates recommends that the Council re-run the appraisal of housing growth options through the SA in order to reasonably conclude on a preferred option which has been robustly tested.	The preparation of a Local Plan is an iterative process. Chapter 5 of the SA assesses the Issues and Options version. Subsequent versions of the Plan have also been subject to SA and this is presented in the SA Report. The Council thus considers the SA to process to be robust and does not propose any change.	No
A0148	B003	The requirement for EVCPs should be deleted given the Government's proposed changes to Building Regulations are still at the consultation stage and therefore have not been finalised.	The policy encourages new electric vehicle infrastructure rather than requires it ( in recognition of the role of Building Regulations in this area). As such the phrasing of the policy is considered appropriate. No change proposed.	No
A0148	B004	n/a	Support welcomed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0148	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	Not Specified	Not Specified	Significant concern regarding the form of the proposed housing trajectory in that it fails to adequately detail the specific expected rate of housing delivery over the plan period. The failure to outline specific delivery rates from the identified housing allocations renders the Policy SP7 unsound given its conflict with the requirement of NPPF paragraph 73.
A0148	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	Not Specified	Not Specified	In terms of safeguarding land, the approach is over-cautious. Safeguarded land should be allocated for housing through this Local Plan review to meet the needs within this plan period, rather than beyond 2038 to ensure flexibility, complies with DtC, affordable housing needs are met, and infrastructure and economic needs are met. In identifying additional sites to deliver an increased housing requirement, safeguarded sites should be considered ahead of other sites given that they have been assessed and identified as acceptable in principle for development. The council do not specify what type of development the land at Albrighton, Alveley and Shifnal relates. The Council has not specified a period beyond 2038 for which the safeguarded land is intended to accommodate, however 5 years in this instance is considered appropriate.
A0148	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	Not Specified	Not Specified	Should the Council wish to apply the optional nationally described space standards ('NDSS') to both market and affordable new-build dwellings, this should be done in accordance with Footnote 46 of NPPF Paragraph 127(f). Whilst the justification makes reference to the SHMA, at paragraph 4.11-4.12, it is noted that the SHMA itself undertakes no assessment or analysis of the need for NDSS on either affordable or market new-build dwellings. Consequently, it is understood that justification for this policy requirement is set out solely through the DSLP at paragraphs 4.7-4.16. Para 4.11 refers to a finding of the SHMA which identified overcrowding in 11% of social rented accommodation. Clearly, social rented accommodation represents only one tenure of affordable housing; such a finding disregards other affordable housing tenures, whereby households in Shropshire may not necessarily experience overcrowding, and thus does not represent the overall trend. The Council also speculates on the impact of the 'bedroom tax' on overcrowding within the social rented sector; it provides no further evidence otherwise justifying the need for NDSS on new-build affordable housing.
A0148	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	Not Specified	Not Specified	The Council should afford further consideration to an uplift of its LHN to account for acute affordable housing need, and subsequently adjusts its housing requirement to reflect this.
A0148	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP20	Not Specified	Not Specified	Not Specified	Should the Council wish to adopt the higher optional standard for water efficiency of 110 litres per person per day, a clear need for this should be established based on the following, as also advised by the PPG – existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement. The Shropshire Water Cycle Study (2020), which forms part of the Council's evidence base, confirms that the regions served by Severn Trent and United Utilities are areas of 'moderate' water stress and that Shropshire is not in an area of high water stress compared with the south and east of England.
A0148	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP25	Not Specified	Not Specified	Not Specified	Support for this policy. L&Q Estates considers that its land interests at Shifnal are well situated to accommodate residential development, as new dwellings would be located close to existing green spaces and the proposed site layout will promote walking and cycling.
A0148	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP27	Not Specified	Not Specified	Not Specified	L&Q Estates consider the Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in the statutory Building Regulations. The Press Release confirmed the requirement will apply to all to new builds development, and that the new measures will place responsibilities on both developers and network operators. It also confirms that the legislation is to be laid as soon as parliamentary time allows and will be laid as secondary legislation so that it can be introduced quicker.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0148	B005	The failure to outline specific delivery rates from the identified housing allocations renders the Policy SP7 unsound given its conflict with the requirement of NPPF paragraph 73.	A cautious high level trajectory for proposed allocations is provided within Appendix 7 of the draft Shropshire Local Plan, based on proactive discussions with site promoters. If ultimately adopted, trajectories for sites will be kept under review as part of the Five Year Housing Land Supply Statement.	No
A0148	B006	It is considered that the Council's 'Forecast of Delivery Timescales for Local Plan Allocations' lacks sufficient details on the anticipated delivery rates of allocations; resultingly, the DSLP assumes an unrealistic and overambitious build-out rate of housing within the plan period, and thus a number of sites including the above strategic sites are likely to continue to deliver beyond 2038. L&Q Estates considers that the safeguarded site at 'land between Revells Rough, Lamledge Lane and the eastern rail line' in Shifnal should instead be allocated for housing to meet needs within the plan period rather than beyond 2038.	It is understood that this representation primarily relates to the proposed development strategy and identified allocations for Shifnal and not the content of draft Policy SP11. Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers that it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. Assumptions regarding non-delivery rates, windfall allowances and delivery timescales for proposed allocations are considered appropriate and respond to consideration of the specific characteristics, constraints and opportunities that exist across Shropshire, in specific settlements and on specific sites. In accordance with national policy safeguarded land is appropriately identified to meet needs beyond the current Plan period and decisions on future allocation of safeguarded land would be a matter for a future Local Plan Review.	No
A0148	B007	NDSS assists in mitigating impacts from overcrowding and does not in itself reduce the level of overcrowding. Whilst overcrowding in the region may be an issue requiring tackling, the Council should consider it a symptom of an under-supply of housing. Before adopting the NDSS, the Council should provide an accurate local assessment evidencing the case for Shropshire as this has not been demonstrated, and thus the policy requirement fails the test of soundness and should be removed.	Noted. The approach to nationally described space standards proposed within Para 3 of draft Policy DP1 is considered to positively respond to the evidence available within the Strategic Housing Market Assessment (SHMA) and other sources. Providing dwellings with sufficient internal floorspace positively contributes to the future occupier's ability to achieve a high-quality of life and is responsive to changing household requirements, by increasing the ability to include adaptations at a later date.	No
A0148	B008	The Council should afford further consideration to an uplift of its LHN to account for acute affordable housing need, and subsequently adjusts its housing requirement to reflect this.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. The draft Shropshire Local Plan introduces a range of mechanisms to support the delivery of affordable housing.	No
A0148	B009	The requirement for the higher water efficiency standard is unsound because it is unjustified and inconsistent with national policy. This policy requirement should be deleted.	The government has introduced an optional new Building Regulation standard that can be required through a Local Plan policy if it addresses a clearly evidenced need and its impact on viability has been considered. The Shropshire Water Cycle Study provides the evidence for a standard of 110 litres per day per person and this has been assessed through the Shropshire Viability Study. No change proposed.	No
A0148	B010	The proposed development is well located to existing and future planned employment opportunities, community facilities and transport connections, and should therefore be considered favourably in the context of Policy DP25.	Support noted.	No
A0148	B011	The proposed requirements of Policy DP27 are unnecessary and repetitive of Building Regulations and should therefore be deleted.	Shropshire Council is working to improve broadband connectivity across the County through its Connecting Shropshire programme to attract commercial superfast broadband infrastructure investment and to bring faster broadband to areas where it is not economically viable for commercial operators to provide these services. The purpose of these objectives for connecting Shropshire to the best electronic communications infrastructure into their business premises and homes is to ensure businesses, employees and residents can embrace and optimise the use of broadband in their everyday lives. Unless the development market also embraces these objectives in their development design schemes and build specifications through the provision of network infrastructure and fibre to premises technologies then the roll out of digital connectivity will not be achieved and Shropshire will struggle in its programme to move towards and achieve the broader objective of creating a zero carbon economy in the County.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0148	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15	Not Specified	Not Specified	Not Specified	Support retention of 'saved' allocation SHIF006 (Land north of Wolverhampton Road) as well as the housing allocation of SHF022 and SHF023 (Land between Windmill View and The Monument on A464).
A0149	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	Not Specified	No	Not Specified	The Plan is unsound because it is: Not positively prepared – the plan does not fully meet the area's objectively assessed needs, and does not adequately accommodate unmet need from neighbouring areas; -Unjustified – the plan's strategic approach is not appropriate; it does not take account of reasonable alternatives and is not based on proportionate evidence; -Ineffective – the plan is undeliverable over the plan period and is based on ineffective joint working which does not properly deal with strategic matters; -Inconsistent with national policy – the plan prevents the delivery of sustainable development.
A0149	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	The housing requirement which underpins the strategic approach in Policy SP2 is flawed and fails the tests of soundness. By setting an unambitious housing target which fails to accommodate unmet need from neighbouring areas or take account of market conditions, the plan has not been 'positively prepared', it is 'unjustified', 'ineffective' and 'inconsistent with national policy'. As we explore in our representations below, it is our view that the housing requirement figure of 1,400 dpa set out in Policy SP2 does not represent a sound approach to significantly boost the supply of homes above the standard method figure of 1,177 dpa. Given that Shropshire is relatively unconstrained, there are other factors which ought to have been considered, including unmet need from neighbouring areas and current and future demographic trends and market signals. There is no explanation as to why Shropshire can only accommodate 1,500 homes for the Black Country. In the absence of anything to the contrary, our suspicion is that this is simply a result of the current standard method figure of 1,177 dpa (i.e. the 'minimum' that Shropshire has to provide) being 'rounded up' to 1,400 dpa and being repackaged as meeting unmet housing needs of ABCA. ABCA's Urban Capacity Study (December 2019) identified a shortfall of about 26,920 homes which cannot be accommodated within ABCA's boundaries and therefore needed to be met in neighbouring areas – a higher requirement for Wolverhampton will increase this shortfall further. It is considered that the authority struggles to provide affordable housing for those on low incomes, which indicates that a higher level of affordable housing is needed - an increase in houses delivered will mean an increase in affordable houses delivered. Much Wenlock (including the settlement of Cressage and the wider Raby Estate) is one such place where housing is considered unaffordable, therefore this would be a logical area to increase housing provision. In our view, the council's economic growth aspirations will not be realised if the investment potential in housing delivery will be frustrated through an unambitious and modest increase in the housing requirement above the standard method and below recent delivery rates
A0149	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	The Plan allocates an insufficient supply of sites, relies too heavily on windfalls and strategic sites and fails to accommodate a 'safety buffer.' Shropshire should allocate a greater number of sites to ensure there is a truly plan-led approach to development in the County. The heavy reliance on windfalls, in our view, increases the risk of the plan's failure as it undermines its robustness. In particular, we have concerns that the windfall allowance may not be achievable given the tight boundaries drawn around settlements (such as Cressage) which limits opportunities for such windfalls from occurring. In our view more sites including the Beslow Garden Village should be allocated as an additional site for the plan. NPPF para 72 suggests that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. The supply equates to a surplus of just 330 dwellings or 1%. Clearly this is a dangerously low 'safety buffer' which places the plan at risk of failure – this is 'ineffective'. 44% of the total supply is delivered on sites with planning permission or sites allocated but without planning permission. There is a risk that sites with planning permission may not come forward as expected. There is a risk of failure if one of the strategic sites does not come forward as expected.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0148	B012	L&Q Estates disagree with the proposed approach to the safeguarding of land between Revells Rough, Lamledge Lane and the eastern rail line and considers that this land should be allocated for housing in order to meet an increased housing requirement	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This provision of land for housing development in the period to 2038 includes sites SHF022 and SHF023 and the saved allocation SHIF006 is contained in Appendix 2 to the draft Local Plan. It is considered that the remaining safeguarded land north of Revells Rough is remotely located from the built form and highway network of Shifnal and the release of this remaining safeguarded land should be determined as part of a future strategy for Shifnal.	No
A0149	B001	[Confirmed policy by policy within wider representation]	Noted. Shropshire Council considers that the draft Shropshire Local Plan is positively prepared, justified, effective and consistent with national policy. Further comments are provided in response to the wider representation.	No
A0149	B002	To be positively prepared, effective and consistent with national policy Shropshire should increase its contribution to meeting the unmet needs from ABCA and address the future impact of the 35% uplift in the largest cities of the West Midlands. Shropshire is unconstrained and therefore well placed to provide a substantial contribution. We recommend Shropshire should accommodate 250dpa over the plan period or 5,500 dwellings in total. To respond adequately to the market trends and the economic growth strategy a more appropriate housing requirement would be 2,000dpa and Strategic Policies of the local plan should be updated accordingly.	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0149	B003	The plan should: <ul style="list-style-type: none"> <li>•Revisit the strategic approach</li> <li>•Accommodate more unmet need from ABCA</li> <li>•Respond to market signals and growth strategy</li> <li>•Place less reliance on windfalls</li> <li>•Identify an additional buffer of sites</li> <li>•Allocating more sites, strategic sites and new settlements</li> </ul>	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. It is considered that the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances are appropriate and deliverable. Furthermore, draft Policy SP7 and other relevant policies provide the policy mechanism to respond to circumstances where the housing guidelines for particular settlements appears unlikely to be met over the proposed Plan period, or where there are specific considerations set out in the Settlement Policies. As such it is not considered necessary or appropriate to include a reserve site policy. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0149	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	Not Specified	No	Not Specified	The amended wording of the Whole Estate Plan policy (SP15) does not adequately address the concerns raised in our previous representation. The policy as written will continue to prevent the Estate using a Whole Estate Plan to bring forward projects that conflict with Local Plan, undermining proposals that could contribute to the achievement of locally led sustainable development.
A0149	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	Not Specified	No	Not Specified	Given the rural nature of Shropshire it is likely that Whole Estate Plans will be prepared for areas that encompass land that falls outside any identified development boundary/settlement type. It is therefore surprising that SP10 does not refer to Whole Estate Plans in either the policy text or supporting explanatory text to support development that comes forward in accordance with an endorsed Whole Estate Plans. The policy should be amended to ensure that the approach is consistent with the NPPFs requirements for plans to be positively prepared and the requirement that policies are clearly written and unambiguous so that it is clear for decision makers how they should react to proposals.
A0149	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	Not Specified	No	Not Specified	The draft plan makes no provision for the designation of a community cluster accept through the Neighbourhood Plan process. This is overly restrictive and inconsistent with national policy.
A0149	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	Not Specified	No	Not Specified	S13 and its associated schedules are unsound. The strategy for the area, and specifically the strategy for Cressage is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives, it is not deliverable over the plan period and is inconsistent with national policy. Cressage is lacking in several services and amenities. To address local circumstances the draft settlement policies relating to Cressage would need to improve barriers to housing by providing more, deliver employment, deliver adequate green space and deliver highway safety improvements. The draft policies for Cressage fail to meet the criteria set out above as required by Paragraph 77 of the NPPF and the policies are therefore inconsistent with national policy. There is insufficient evidence to demonstrate that site CES005 can be delivered. Even if the site were deliverable, there is no evidence that 60 dwellings could be provided on site CES005 without significant conflict with other draft policies of the local plan. There is a need for employment land in Cressage.
A0149	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.1 Much Wenlock	Not Specified	No	Not Specified	The policies for the Much Wenlock Place Plan area fail to deliver on the draft plan's strategic objectives: they do not provide sufficient growth to meet the growth projections of the Place Plan area and do not propose additional growth above the needs of the Place Plan area to deliver the Economic Growth Strategy or contribute to the links between Shropshire and the West Midlands region. Much Wenlock has 1.7% of the households in Shropshire. If growth across Shropshire were planned to be proportionate to the existing distribution of population then the approach for Much Wenlock Place Plan area would equate to approximately half of what it should be.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0149	B004	<p>Add additional wording (in asterisks) to section a) so that it reads:</p> <p>1. Whole Estate Plans are a method by which Estates can articulate their long-term vision for their land and premises interests and how these will be achieved. In recognition of the nature of Shropshire, and the potentially important role they play in managing land within the County, Whole Estate Plans prepared by Estates will be endorsed by the Council *and will be given significant weight* in decision making where they have demonstrated all of the following:</p> <p>a. The objectives, policies and land use proposals of the Whole Estate Plan *are in general conformity* with the strategic policies of the Local Plan;</p> <p>b. It has been prepared in collaboration with relevant external organisations, including statutory bodies; and</p> <p>c. It has been subject to meaningful public consultation.</p>	<p>Noted. Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. However, Shropshire Council also considers that it is appropriate for Whole Estate Plans to be endorsed by the Council and used as a material consideration in decision making to have objectives, policies and land use proposals that complement and are consistent with the objectives and policies of the Local Plan.</p> <p>The amount of weight that can be applied to Whole Estate Plans that represent material considerations within the Planning process will be determined by the decision taker as it depends on the nature, scope and context of the Whole Estate Plan.</p>	No
A0149	B005	<p>SP10 should be amended as follows:</p> <p>Add to para 3: "g. Employment, business, renewable energy and community development that comes forward as part of a Whole Estate Plan endorsed in accordance with Policy SP15."</p> <p>Add to para 4: "h. Suitably designed and located dwellings and housing schemes which meet evidenced local housing needs that come forward as part of a Whole Estate Plan endorsed in accordance with Policy SP15."</p>	<p>Draft Policy SP15 relates to Whole Estate Plans, referencing their role as non-statutory plans produced by Estates themselves. Whilst not specifically referenced in Draft Policy SP10, the draft Shropshire Local Plan has to address a wide range of issues and requirements and is intended to be read as a whole. Therefore, in addition to the criteria set out in Draft Policy SP10, the relevant considerations of all other applicable policies will need to be taken into account in decision making on planning applications, along with other material considerations.</p>	No
A0149	B006	<p>To ensure consistency with the Local Plan we recommend a modification to Policy SP9 as follows (additions in asterisks, deletion in square brackets):</p> <p>6. Existing Community Clusters are identified within Schedule SP2.2 of Policy SP2. New Community Clusters can be brought forward [by the community] through the Neighbourhood Plan *or Whole Estate Plan Endorsement* process and will be subject to this Policy and the other requirements of the Local Plan.</p>	<p>Shropshire Council considers that if new Community Clusters are to be brought forward, this should be through the Neighbourhood Plan process, rather than a Whole Estate Plan or other such mechanism. Formal Neighbourhood Plans, once made, form part of the Development Plan.</p>	No
A0149	B007	<p>The housing guideline for Cressage should be 140 dwellings.</p> <p>Our site at Shore Lane would provide the improvements needed in Cressage and should be a housing allocation.</p> <p>CES005 should have its guideline reduced to 40 dwellings due to housing densities. Site CES002 is promoted by the Raby Estate as a mixed-use scheme and will assist with the lack of employment in Cressage. This site should be allocated.</p> <p>S13.2 para 3 should read (additions in asterisks, deletions in square brackets):</p> <p>3. Within Cressage, *500sqm floor space of* employment development will be delivered through *a mixed-use allocation* appropriate [small-scale windfall employment development within the settlements development boundary, as shown on the Policies Map], where it is consistent with Community Hub Policy SP8 and other relevant policies of this Local Plan.</p>	<p>Shropshire Council considers that the proposed development strategy for Cressage which is to change from being a settlement in the countryside to become a Community hub, the housing guideline figure, the proposed development boundary and the proposed allocations that contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The identification of proposed allocations were informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways matters with colleagues in the Developing Highways team. Sites have been chosen that will deliver a range of benefits for the community including measures to address the issue of traffic speeding through the speed restricted zones of the village. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community. This will require a suitable scale of development for Cressage and the relatively modest housing guideline figure of 80 dwellings is considered to be appropriate to the size and function of the settlement. The greater proportion of this requirement is to be delivered on site CES005 (60 dwellings) which comprises a relatively flat, open and accessible development opportunity. The design of the development scheme for this site may have a positive impact on the traffic flows through the village. Residents of the proposed development will also have ready access to the principal services in the village particularly through the footway network within the village.</p>	No
A0149	B008	<p>A positive step towards achieving soundness of policies of the local plan would be to increase the residential guideline in Cressage and to ensure that any development coming forward within Cressage is a mixed residential and employment scheme</p>	<p>Shropshire Council considers that the proposed development strategy for Cressage and the housing guideline figure are appropriate and effective,</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0150	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2	Not Specified	No	Not Specified	Clive point score inaccurate & out of date , includes services are no longer available i.e. bowling green and shop. Shop closure permanent. Bowling green not publicly available. Correct score 47
A0151	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0150	B001	Council should reassess Clive, remove points allotted for shop and bowling green. Recalculation will remove Community Hub status	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0151	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0151	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030).</p> <p>At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers ‘.. will make provision for the needs of the town and surrounding hinterland...’?</p> <p>In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?</p>
A0151	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3	Not Specified	No	Not Specified	<p>The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p> <p>The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the “sustainable urban extension” stated in the Local Plan.</p>
A0151	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3	Not Specified	No	Not Specified	<p>In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth.</p> <p>However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0151	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0151	B003	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0151	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0151	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3	Not Specified	No	Not Specified	<p>Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site.</p> <p>Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18.</p> <p>It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated?</p> <p>BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.</p>
A0151	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3	Not Specified	No	Not Specified	<p>The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan.</p> <p>Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment.</p> <p>Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458.</p> <p>Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network.</p> <p>The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.</p>
A0151	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference?</p> <p>Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters?</p> <p>Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?</p>
A0151	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3	Not Specified	No	Not Specified	<p>Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published?</p> <p>Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated.</p> <p>There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth?</p> <p>BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.</p>
A0151	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP21	Not Specified	No	Not Specified	<p>A development the size of BRD030 has the potential to exacerbate flooding issues and drainage of Tiddlebrook. Have the promoters demonstrated how surface water will be managed and coordinated now and over the lifetime of the development. Are alternative sites available that have a lower risk of flooding and should these not be considered first?</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0151	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0151	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0151	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0151	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No
A0151	B009	<p>Assess flood risk and consider alternative sites with a lower flood risk.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of flood risk.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They includes that "development will also be excluded from the portions of the site located in Flood Zones 2 and/or 3. These areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0152	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.32	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>
A0153	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	<p>Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ.</p> <p>It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored.</p> <p>A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0152	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No
A0153	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0153	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030).</p> <p>At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers ‘.. will make provision for the needs of the town and surrounding hinterland...’?</p> <p>In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?</p>
A0153	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	<p>The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p> <p>The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the “sustainable urban extension” stated in the Local Plan.</p>
A0153	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth.</p> <p>However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0153	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0153	B003	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0153	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0153	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site.</p> <p>Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18.</p> <p>It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated?</p> <p>BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.</p>
A0153	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan.</p> <p>Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment.</p> <p>Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458.</p> <p>Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network.</p> <p>The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.</p>
A0153	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference?</p> <p>Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters?</p> <p>Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?</p>
A0153	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published?</p> <p>Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated.</p> <p>There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth?</p> <p>BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0153	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0153	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0153	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0153	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0154	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Longden	Not Specified	No	Not Specified	Do not consider the draft Shropshire Local Plan to be sound or sustainable. Do not agree with the methodology adopted within the Hierarchy of Settlements Assessment as applied to Longden (see letter from Longden Village Action Group (LVAG)). Unclear why sites which have been subject to refused appeals are considered.
A0155	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Longden	Not Specified	No	Not Specified	Do not consider the draft Shropshire Local Plan to be sound or sustainable. Do not agree with the methodology adopted within the Hierarchy of Settlements Assessment as applied to Longden (see letter from Longden Village Action Group (LVAG)). Unclear why sites which have been subject to refused appeals are considered.
A0156	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period. Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed. Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants. The consultation did not ask the community if they want more housing or to remain as countryside. There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses: -Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities. -Has only a single children's playground and amenity green space, not multiple provision. -Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.
A0157	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period. Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed. Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants. The consultation did not ask the community if they want more housing or to remain as countryside. There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses: -Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities. -Has only a single children's playground and amenity green space, not multiple provision. -Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0154	B001	Revisit the Hierarchy of Settlements assessment and allocate Longden Village as a Community Cluster rather than a Community Hub.	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and</p> <p>In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past <u>Planning Applications</u>. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.</p>	No
A0155	B001	Revisit the Hierarchy of Settlements assessment and allocate Longden Village as a Community Cluster rather than a Community Hub.	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and</p> <p>In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past <u>Planning Applications</u>. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.</p>	No
A0156	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0157	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0158	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0159	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0160	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0161	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0158	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0159	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0160	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0161	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0162	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0163	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0164	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0165	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0162	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0163	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0164	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0165	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0166	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0167	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0168	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0169	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0166	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0167	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0168	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0169	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0170	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0171	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0172	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0173	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0170	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0171	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0172	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0173	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0174	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0175	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0176	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0177	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0174	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0175	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0176	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0177	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0178	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0179	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0180	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0181	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0178	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0179	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0180	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0181	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0182	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0183	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0184	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0185	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0182	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0183	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0184	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0185	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0186	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0187	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0188	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0189	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0186	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0187	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0188	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0189	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0190	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0191	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
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A0194	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
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A0198	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
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A0200	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>



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A0201	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	No	No	<p>Generally supportive of the proposed urban-focused spatial strategy within the draft Shropshire Local Plan.</p> <p>Do not object to proposed housing requirement of 30,800 dwellings, which has had regard to the minimum Local Housing Need (LHN) calculated using the standard method, with an upward adjustment of around 13% (3,406 dwellings) to meet Council needs plus 1,500 dwellings to meet needs of the Black Country. Welcome adjustments, but question whether they are sufficient as:</p> <p>-The Black Country Authorities acknowledge an inability to accommodate around 27,000 dwellings of their requirement (compounded by Wolverhampton being one of the 20 largest Cities subject to Government's proposed 35% increase to minimum local housing need). Furthermore, there is an established unmet need of around 37,900 dwellings from Birmingham City (in the same Housing Market Area as the Black Country), which is also one of the 20 largest Cities subject to the proposed uplift to need. Only aware of South Staffordshire Council (4,000 dwellings) also proposing contributions to the Black Country at present, leaving a shortfall of 20,000 dwellings. Given timescales for the Black Country Local Plan Review, there may be little further opportunity for them to seek further contributions to unmet need from Shropshire. Query whether sufficient support has been secured from the Black Country Authorities for this proposed contribution without a signed memorandum of understanding or indeed with South Staffordshire who stand to be hardest hit. Clearly Shropshire has a functional relationship with the Black Country and wider Birmingham conurbation and as such consider it should make a significantly greater contribution. As such, welcome proposed contribution to Black Country needs, but do not consider it sufficient as not agreeing a larger contribution means more of the housing need of the Black Country will go unmet. Therefore the draft Shropshire Local Plan is unsound as it is not positively prepared or effective. Shropshire Council needs to enter into a memorandum of understanding with the Black Country Authorities to confirm the proposed 1,500 dwelling contribution is acceptable to all, without this there is a question as to whether a higher contribution is required to reach agreement and how the Black Country and Greater Birmingham housing needs will be meeting full. This raises serious implications for whether the duty to cooperate with the Black Country Authorities or other authorities in the Greater Birmingham HMA has been met.</p> <p>-Para 3.6 of the explanation for draft Policy SP2 identifies the reasons for the housing requirement exceeding need. This includes delivery of affordable housing, but current and future affordable housing needs are much higher than proposed delivery (around 10,000 dwellings more), as demonstrated by the Council's evidence, one way to try and address this shortfall is more housing. This evidence also illustrates worsening market signals (particularly with regard to provision of affordable housing) and do not consider this is addressed within the Council's proposed strategy.</p> <p>Support the role of Whitchurch as a Principal Centre, identification of which was informed by the Hierarchy of Settlements, a consistent methodology for ranking settlements according to their relative sustainability through assessing the services and facilities. Contend Whitchurch scores highly within this assessment and agrees it is suitable to accommodate new residential development to meet the needs of the County going forward in a sustainable manner. This accords with para 103 of the National Planning Policy Framework (NPPF).</p>
A0201	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Yes	No	Yes	<p>Object to Part 2a of draft Policy DP1 as it is not considered effective and is therefore unsound and should be deleted.</p> <p>It states on sites of 5 or more dwellings, at least 50% must reflect the profile of a Local Housing Need Survey undertaken and endorsed by Shropshire Council. Understand the need for a mix of house types, sizes and tenures but it is important that any policy in this regard is effective and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements. Further, the Strategic Housing Market Assessment (SHMA) is a critical part of the plan's evidence base and are concerned this would allow the findings of the SHMA to be effectively overruled on a settlement-by settlement basis outside of the normal plan-making exercise, creating uncertainty for developers, stakeholders and decision makers.</p> <p>If a settlement-specific approach to housing mix is justified by evidence, this should be incorporated into a Neighbourhood Development Plan rather than a housing needs survey (not subject to consultation or independently tested).</p> <p>Consider Part 6 of draft Policy DP1 is not justified or effective and as such is unsound and should be deleted. It relates to the provision of specialist housing for older people and those with disabilities and special needs on sites of 50 or more dwellings. Cannot see any evidence for how this threshold has been arrived at or how it responds to the quantum of need for such housing, the only justification relates to an ageing population (in common with England), and for those with disabilities, no information has been provided regarding arising needs. Also the draft Policy does not specify the proportion of a site that should consist of specialist housing, creating uncertainty for developers, stakeholders and decision makers. There is also no mention of viability nor is it clear how draft Policy DP1 has been viability tested.</p>
A0201	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP15 / DP16	Yes	No	Yes	<p>Object to Part 2 of draft Policy DP15 as it is not justified or effective. It states new development should provide on-site open space provision equivalent to 30m2 per person (assuming one person per bedroom). Recognise this is a continuation of the current policy requirement, but the current policy specifically allows for delivery through off-site financial contributions, but this flexibility is removed from draft Policy DP15.</p> <p>Mandating such a high requirement without regard to local variation in need/provision and with no option to make off-site contributions in lieu of on-site provision could have a significant effect on site capacity and therefore delivery of the draft Shropshire Local Plan's requirement for market and affordable housing.</p>

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A0201	B001	<p>Suggest further negotiation is undertaken by the Council with the Black Country Authorities to agree whether any additional housing is needed to be made available in Shropshire to meet unmet needs arising in the Black Country, and if so what this increase should be.</p> <p>Entering into a signed Memorandum of Understanding with the four Black Country Authorities would demonstrate agreement has been reached and the Council's duties under the duty to cooperate have been discharged.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council has proactively engaged in duty to cooperate discussions with relevant bodies, including relevant Local Authorities, throughout the Local Plan Review process. Statements of Common Ground will be prepared with these bodies, informed by the content of the draft Shropshire Local Plan subject to Regulation 19 consultation.</p>	No
A0201	B002	<p>Delete Part 2a of draft Policy DP1.</p> <p>Delete Part 6 of draft Policy DP1.</p>	<p>Noted. It is considered para's 2a/b of draft Policy DP1 provide an appropriate balance between ensuring new development will include an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) about housing mix requirements, and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand.</p> <p>Specifically with regard to para 2a, it is considered that this approach allows for the housing mix proposed on a site to positively respond to the most recent information on local housing need for communities where in the last 5 years a Local Housing Need Survey has been undertaken under either the Right Home Right Place Council-led initiative or an equivalent survey endorsed by Shropshire Council.</p> <p>The National Planning Policy Framework (NPPF) specifies that housing needed for different groups in the community should be assessed and reflected in planning policies, this includes the needs of older people and those with disabilities. The Strategic Housing Market Assessment (SHMA) indicates that growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the proposed Local Plan period from 2016 to 2038. It also identifies a specific need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision. In order to ensure the needs of older people and those with disabilities are met it is considered that there is a need to provide accessible and wheelchair user dwellings and an appropriate range of specialist housing designed to meet their diverse needs.</p> <p>With regard to specialist designed housing (for older people and those with disabilities), it is recognised that sites of 50 or more dwellings will be diverse in nature. It is for this reason that a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors.</p> <p>The draft Shropshire Local Plan has been informed by a whole Plan Viability Assessment which is considered a robust and proportionate assessment.</p>	No
A0201	B003	<p>Reword the policy to allow local need to be taken into account and delete the phrase "on-site" from the draft Policy.</p>	<p>Paragraph 5 of this policy allows for off-site provision where sufficient open space is not possible on site. No change proposed.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0201	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18	Yes	No	Yes	<p>Support identification of Whitchurch as a Principal Centre and the town acting as a focus for significant development over the plan period. This is consistent with the evidence base for the Plan and consistent with the plan's urban-focused spatial strategy that outperforms reasonable alternatives considered through the Sustainability Appraisal process. Support allocation of WHT014 for 70 new homes. The site is suitable, available, achievable and therefore deliverable (promoters committed to its development early in the proposed Plan period and intend to submit a Planning Application upon adoption of the Local Plan, delivering 50 dwellings per annum), sustainable, complements the proposed spatial strategy and can be delivered in line with aspirations contained in the draft Policy.</p> <p>Refreshed illustrative Masterplan and visuals prepared (Appendices to this representation) show how the site could be developed in a manner than avoids adverse impacts, complies with the draft provisions set out in Schedule S18.1(i), whilst maximising the efficiency of the site to deliver the balance of the allocation.</p> <p>The site is not subject to any technical, physical or environmental constraints that would prevent its development:</p> <ul style="list-style-type: none"> <li>-Consideration of past Planning Applications on the site established access onto Liverpool Road was acceptable and no wider issues arose on the road network requiring mitigation, whilst additional highway work shows principal accesses are deliverable and opportunities exist to support pedestrian/cycle connectivity.</li> <li>-Updated ecology work shows there are no fundamental ecological constraints as the site is dominated by poor semi-improved grassland with species-poor hedgerows and fencing field boundaries and that Great Crested Newts are not present in nearby ponds.</li> <li>-Consideration of past Planning Applications on the site did not raise any heritage concerns (Whitchurch Conservation Area is some distance away).</li> </ul> <p>Object to omission of part of WHT046 (plan and visuals showing proposed allocation WHT014 and part of WHT046 provided as appendices to this representation). This land is deliverable; free from any technical, physical or environmental constraints; provides the potential to 'round off' proposed allocation WHT014; could be developed alongside WHT014 in a comprehensive manner (green infrastructure, highway etc); would improve the overall layout of these developments and allow efficient use of land; and provide around 30 additional dwellings. The site is enclosed on two sides by proposed allocation WHT014 and another by properties fronting Alkington Road. If additional housing land is required to meet cross-boundary needs, sites adjacent to proposed allocations should be considered.</p> <p>Concerned about deliverability of existing allocations WHIT009 and WHIT021 (capacity for 600 dwellings). Both sites have Planning Permission but neither are being developed to meet needs. As such consider additional sites and land in Whitchurch should be identified in order to provide a buffer and ensure that the housing requirement for the town is met. Part of WHT046 presents a sensible way to do this.</p>
A0202	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period. Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0203	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period. Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0201	B004	Include part of site WHT046 as a proposed allocation.	<p>Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>	No
A0202	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0203	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0204	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0205	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0206	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0207	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0204	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0205	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0206	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0207	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No

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A0208	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0209	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0210	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0211	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0208	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0209	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0210	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0211	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0212	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0213	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0214	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0215	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0212	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0213	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0214	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0215	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0216	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0217	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0218	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0219	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0216	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0217	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0218	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0219	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0220	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0221	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0222	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0223	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period.</p> <p>Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0220	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0221	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0222	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0223	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0224	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Cross Houses	Not Specified	No	Not Specified	<p>Cross Houses should be identified as countryside rather than a Community Hub, to ensure no significant housing development occurs within the proposed Plan period. Furthermore whilst the draft Shropshire Local Plan does not propose to allocate significant new housing sites in the settlement, Community Hub status allows for the possibility of future development when the draft Plan is next refreshed.</p> <p>Concerned about the significant level of housing that has recently occurred in Cross Houses. Residents have had to put up with associated increases in traffic, construction/traffic noise and loss of countryside. Consider the majority of residents do not want further large scale development in the village. A housing need survey needs to be undertaken to establish what the community wants.</p> <p>The consultation did not ask the community if they want more housing or to remain as countryside.</p> <p>There are several areas of contention within the Hierarchy of Settlements Assessment, which the Inspector should review. Specifically Cross Houses:</p> <ul style="list-style-type: none"> <li>-Is awarded points for a library, however only provision is a mobile library (visits 2x a month for 25 minutes each). Consider a library for the purpose of this assessment is a permanent fixture, as per all other facilities.</li> <li>-Has only a single children's playground and amenity green space, not multiple provision.</li> <li>-Outdoor sports facility is not owned by the Parish and regularly flooded over the last 3 months.</li> </ul>
A0225	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	No	No	<p>The draft Shropshire Local Plan in relation to Much Wenlock is not legally compliant as it has made little or no representation to the community and required by the legally adopted and current Much Wenlock Neighbourhood Plan.</p> <p>Whilst Much Wenlock Town Council support the draft Shropshire Local Plan, they failed to consult the community before making this decision.</p> <p>Proposed allocation MUW012VAR is prone to severe flooding (evidenced in Feb 2019 and Jan 2020). This decision has not been informed by appropriately qualified individuals.</p> <p>Draft site guidelines for proposed allocation MUW012VAR calls for excess water to be contained within the site (via an attenuation pond) with no run-off allowed, how is this possible when the pond is full and there is evidence of percolation through sub-strata.</p> <p>No consideration has been given to alternative sites which have been subjected to attenuation ponds, such as MUW008 which is still shown as liable to flooding although it did not flood in Feb 2019 - therefore for convenience no review has been undertaken after the floods.</p> <p>Much Wenlock is also threatened by over development from Ironbridge Power Station and Tasley, Bridgnorth.</p> <p>The A458 and A4169 are identified as part of the 'Eastern Strategic Corridor' from the Black Country to the M54, yet the Gaskell Corner junction is already at capacity and developers of Ironbridge Power Station admit development will overload the junction but present no plausible alleviation.</p>
A0226	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	<p>Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ.</p> <p>It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored.</p> <p>A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0224	B001	Identify Cross Houses as countryside rather than a Community Hub.	<p>Noted. Shropshire Council considers the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cross Houses where the service score has been adjusted but did not affect the suitability of the settlement to function as a Community Hub. As such it is considered appropriate for Cross Houses to be designated as a Community Hub in the draft Shropshire Local Plan.</p> <p>The proposed strategy for Cross Houses as a Community Hub recognises the level of development that has occurred over recent years including the level of new housing that is already committed within the village. The draft Shropshire Local Plan proposes a development guideline which can now be fully achieved through further small-scale windfall development alone and does not propose to allocate any additional land for significant housing development in the village. It is considered that this proposed strategy for Cross Houses is appropriate, effective, sustainable and deliverable.</p>	No
A0225	B001	<p>The A458 and A4169 are identified as part of the 'Eastern Strategic Corridor' from the Black Country to the M54, yet the Gaskell Corner junction is already at capacity and developers of Ironbridge Power Station admit development will overload the junction but present no plausible alleviation. The strategy for the east of the County needs to be re-thought.</p> <p>The Much Wenlock Neighbourhood Plan calls for small, managed development sites and these are available as brownfield (MUW001 and MUW002) and parts of sites (MUW008 for example) that are within 10 minutes of both the town centre, local school and recreation facilities.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement.</p> <p>Shropshire Council also considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p>	No
A0226	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0226	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030).</p> <p>At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers ‘.. will make provision for the needs of the town and surrounding hinterland...’?</p> <p>In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?</p>
A0226	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	<p>The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p> <p>The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the “sustainable urban extension” stated in the Local Plan.</p>
A0226	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth.</p> <p>However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0226	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0226	B003	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0226	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0226	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site.</p> <p>Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18.</p> <p>It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated?</p> <p>BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.</p>
A0226	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan.</p> <p>Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment.</p> <p>Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458.</p> <p>Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network.</p> <p>The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.</p>
A0226	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference?</p> <p>Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters?</p> <p>Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?</p>
A0226	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published?</p> <p>Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated.</p> <p>There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth?</p> <p>BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0226	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0226	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0226	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0226	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0227	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Not Specified	Not Specified	No	Not Specified	Clive proposals should be modified as there is no longer a bowling green or shop.
A0228	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Not Specified	Not Specified	No	Not Specified	Since Plan drafted there is no longer a bowling green or shop & proposals should be modified

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0227	B001	remove shop and bowling green as amenities included in planning for Clive	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub. Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0228	B001	remove shop and bowling green as amenities included in planning for Clive	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub. Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0229	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.33	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0229	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0230	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.34	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>
A0231	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	Not Specified	Not Specified	<p>Consider Section S13 of the draft Shropshire Local Plan is not legally complaint for several reasons, in particular:</p> <p>-The draft Shropshire Local Plan purports to reflect policies and priorities of the Much Wenlock Neighbourhood Plan (MWNP), however there is no evidence to support this claim. Actually consider the MWNP and consultation responses from the local community have been ignored - for example the MWNP sets a total target and limit on the size of individual residential developments, but the draft Shropshire Local Plan proposes a large allocation (capacity increased during consultation, greatly increasing the overall guideline for Much Wenlock and making it the largest single development site in the settlements history).</p> <p>-Legal obligations derived from Shropshire Council's role as the lead agent for managing flood risk have not been respected. Much Wenlock is designated a highest category Rapid Response Catchment by the Environment Agency, meaning in the case of flash flooding there is likely to be serious and immediate danger to people and property. Enormous amounts of evidence on this matter have been presented, including relating to proposed allocation MUW012VAR, showing it is liable to flooding and contributes to flooding elsewhere. Under these circumstances, legally, the site should be disregarded if alternative sites not subject to no such risk exist (several such sites are included within the site assessment) but have not been proposed for allocation.</p> <p>The suitable and relatively easy solution to flood management on land adjacent to MUW012VAR has eluded the Council. Outsourcing floor risk management to developers is not acceptable.</p> <p>Representation details evidence sources considered.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0230	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No
A0231	B001	<p>Delete proposed allocation MUW012VAR.</p> <p>Conduct a catchment wide assessment of flood risk and necessary flood prevention/attenuation works necessitated as a consequence of Much Wenlock being designated a Rapid Response Catchment in the highest category by the Environment Agency. Undertake these necessary works.</p> <p>If further development can be safely envisaged, revert to the scale and nature of housing approved in the Much Wenlock Neighbourhood Plan - smaller target on smaller sites catering for local needs including affordable housing and homes for the elderly.</p>	<p>Noted. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement.</p> <p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0231	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan is not sound as defined within the National Planning Policy Framework (NPPF). Draft Policy S13 is not positively prepared in line with Shropshire Council policies, the NPPF or Much Wenlock Neighbourhood Plan.</p> <p>Proposed allocation MUW012VAR fails to comply with Para 7 of draft Policy S13, relating to positively responding to relevant policies and guidelines identified within the Much Wenlock Neighbourhood Plan (MWNP), as it does not conform with the scale, nature of development or prioritisation of local housing needs for affordable homes and the elderly within the MWNP. This is a fundamental failure of soundness in the draft Shropshire Local Plan.</p> <p>MUW012VAR represents a 12% increase in the size of Much Wenlock, this is over-development in an environmentally sensitive area adjacent to the Shropshire Hills AONB. This is on top of existing completions/commitments (which have often responded to local need and arisen without need for an allocation). Cumulatively this represents a significant additional demand on local infrastructure which is evidenced as over-burdened. Without balancing housing, jobs and infrastructure through necessary improvements (including additional secondary school places, expanded medical centre, sewage disposal capacity, water supply, public transport and traffic management) the plan is unsound - no evidence that these issues have been fully addressed.</p> <p>Para 5.180 of the explanation to draft Policy S13 states consideration of surface water flooding is a key consideration for Much Wenlock, but proposed allocation MUW012VAR is subject to flooding and contributes to flooding elsewhere. Despite this, Shropshire Council have failed to take preventive actions to alleviate this off-site as recommended by its consultants in 2011.</p> <p>Place Plans are not mentioned in section 13.1 of the draft Shropshire Local Plan. This omission conceals considerable discrepancies between housing targets in Place Plans and the draft Shropshire Local Plan and major new development proposed within the Place Plan area within 5 miles of Much Wenlock (60 more homes at Cressage; and redevelopment of the Former Ironbridge Power Station in Buildwas Parish, which will have a considerable impact on Much Wenlock but is not referenced at all under section 13 of the draft Shropshire Local Plan being dealt with separately under S20 and there are not links between these draft Policies, recognition it is within Much Wenlock Place Plan Area, or consideration of the potential impact on Much Wenlock (particularly traffic and community services)).</p> <p>Lack of soundness clearly illustrated in failure to consult directly with the public in Much Wenlock on proposals and modifications, despite specific invitations. This is disturbing given high response rate and support from residents within the MWNP process.</p> <p>There has been no detailed consideration of why Much Wenlock is categorised as a highest category Rapid Response Catchment by the Environment Agency. Without this it is impossible to assess whether additional development can be safely accommodated, another reason the draft Shropshire Local Plan is unsound.</p> <p><i>Representation details evidence sources considered</i></p>
A0231	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and S13	Not Specified	Not Specified	No	<p>Shropshire Council have undoubtedly attempted to comply with the duty-to-cooperate by appear not to have done so in a manner that promotes sustainability. The duty-to-cooperate has been narrowly interpreted as being an obligation to provide homes beyond the externally set target. However this cooperation also needs to be consistent with achieving sustainable development.</p> <p>The cooperation proposed (1,500 dwellings to meet cross-boundary needs arising within the Black Country as their evidence indicates housing delivery opportunities are constrained), is inimical to sustainable development and would have the effect of increasing commuting and undermining sense of community in places such as Much Wenlock. The National Planning Policy Framework (NPPF) priorities use of brownfield land, which is far from lacking in the Black Country, where land hungry industry is in decline. Developers preference for greenfield land is well established, but one of the roles of the Planning System is to protect such land. Proposed allocation MUW012VAR combined with achieved/proposed supply exceeds local need and it is absurd to suggest good quality agricultural land should be lost to meet cross-boundary needs.</p> <p>The proposed contribution to cross-boundary need also lacks context of institutional memory. The 'historic' County of Shropshire provided the West Midlands enough land at Telford to build homes for almost 100,000 people (land is still being released for these new homes). Much of these homes in Telford have been within 10 miles of Much Wenlock, with a further 1,000 proposed at the Former Ironbridge Power Station within Much Wenlock Place Plan Area.</p> <p>Excessive housing proposals in east Shropshire are compounded by the presence of Green Belt maintaining open countryside between Telford and the West Midlands. A similar stretch between Telford and Shrewsbury is missing. The view of all was that the integrity of local communities, landscape and access to countryside should be protected. However currently there is unwarranted pressure to build more home over and above need outside the Green Belt, such as Much Wenlock (progressively losing its unique and historic character).</p>
A0232	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0232	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0231	B002	<p>Approve, fund and monitor a review of the Much Wenlock Neighbourhood Plan before proposing major changes to the principles and policies encompassed in the current iteration.</p> <p>Align proposals for Much Wenlock in the draft Shropshire Local Plan with the data in the Place Plan and adjust proposals for Much Wenlock based on analysis of the impact of the redevelopment of the Former Ironbridge Power Station.</p> <p>Delete proposed allocation MUW012VAR as it is inconsistent with Shropshire Council's responsibilities as the lead local flood authority and unsuitable for development prior to action following a whole catchment survey of flood risk.</p> <p>Conduct a catchment wide assessment of flood risk implicit in designation of Much Wenlock as a Rapid Response Catchment in the highest category by the Environment Agency to inform future plans.</p> <p>Plan only for development in Much Wenlock consistent with eliminating increased flood risk.</p>	<p>Noted. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement.</p> <p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>The Place Plans are documents which focus on local infrastructure needs in communities across the county. Place Plan Areas generally consist of a main centre, its surrounding settlements and rural hinterland. These documents have informed consideration of infrastructure requirements associated with development proposals within the draft Shropshire Local Plan.</p> <p>Within the settlement policies section of the draft Shropshire Local Plan, Place Plan Areas are used for the presentation of settlement policies, rather than as areas subject to draft policies. The Former Ironbridge Power Station site is presented separately as draft Policy S20 in recognition of the scale of the site. However consideration of the infrastructure requirements associated with this development and its wider implications have been informed by the Place Plan and have/will be informed by appropriate technical studies.</p>	No
A0231	B003	<p>Whilst non-compliance with the duty to cooperate is regarded as being incapable of management at examination, the modes and features of non-compliance identified are capable of modification. As attention is merely drawn to those elements of the draft Shropshire Local Plan where a narrow interpretation of the Duty to Cooperate has been applied, rather than absolute failure. Suggest the following modification:</p> <p>Remove the elements of the housing requirement over and above those required to meet local need and any externally required targets to meet a national need which can be justified by increased employment opportunities and by the use of brownfield sites.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p>	No
A0232	B001	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0232	B002	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0232	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0232	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0232	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0233	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0233	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0232	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0232	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0232	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0233	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0233	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0233	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0233	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0233	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0233	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0233	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0233	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0234	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	No	Not Specified	Legal status & policies of Much Wenlock Neighbourhood Plan, in particular requirement for limited number of new dwellings to meet local needs on small sites, have been ignored; Council has not complied with legal duty as a risk management authority to avoid development on land that floods; Need to consider evidence of MWNP, Flood Water Management Act 2021, Localism Act 2011, Neighbourhood Planning Regulations 2012 Site – lower part of preferred site subject to frequent flooding, with flooding severity & frequency increasing in recent years potentially due to climate change and nearby development. No new housing should be permitted until flood problem resolved.
A0235	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3 (BRD030)	Not Specified	No	Not Specified	Schedule S3.1(i) indicates that Tasley Garden Village (TGV) will meet Garden village principles. Evidence from 'Transport for New Homes – Garden Villages & Garden Towns: Reality & Vision' report confirms that the majority of such developments not successful because not appropriately located for sustainable travel & result in increased traffic. Considering definition & 3 key principles identified by the TCPA & existing true examples of garden villages – principles of garden village not met by TGV. In considering definition TGV not planned by the LPA in consultation with the local community but is wholly private developer led. Other important principles/requirements of garden villages highlighted by way of comparison to the proposal. Size & location of TGV that of unneeded, inappropriate, large 'bolted on' suburban type housing estate development to a market town, not a sustainable urban extension. Not supported by local people. Will cause irreparable damage to character of Bridgnorth and surrounding area. Does not meet CLG definition of Garden Village.
A0235	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2, S3 & BRD030	Not Specified	No	Not Specified	Do not agree with development strategy for Bridgnorth. Question justification for Bridgnorth being second largest Principal centre as other towns at least same size which should be considered to share burden of significant housing increase. Taking into account land allocated for development, land earmarked post 2038 and existing SAMDev allocation there would be a total of 2250 dwellings built in Tasley resulting in some 4,500 new residents (conservative estimate) & a population increase of 35% to the population of Bridgnorth. No clear explanation provided for proposed dwelling numbers and how they will make provision for needs of town & surrounding hinterland. No local needs housing assessment has been carried out for Bridgnorth and no evidence that increase needed to meet need or that town can support proposed population increase. Explanation of rationale for housing numbers should be provided as part of consultation process.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0234	B001	Delete preferred site MUW012VAR Number and type of homes to reflect local need only. Overall short, medium- & long-term strategy and sites & location for development should be agreed in consultation with community through MWNP review. Comprehensive flood risk study required for Much Wenlock & catchment	<p>Noted. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement.</p> <p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No
A0235	B001	Developer should be required to formally sign up to garden village principles & set out detail of how they will be met. SC should set out how development will be monitored and they will ensure that the developer adheres to garden village key principles' that is: Land value capture for community benefit; strong vision, leadership & community engagement; community ownership of land & long term stewardship of assets	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0235	B002	Commission local housing needs assessment for Bridgnorth and hinterland & other similar size towns & hinterlands to establish actual needs for each. Provide evidence that Bridgnorth's infrastructure is able to sustain the significant impact of the population increase that would result.	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No



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A0235	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12, S3 & BRD030	Not Specified	No	Not Specified	Considering all allocations and approvals 29 ha, an extraordinary area, has been allocated to the Tasley area outside the Bridgnorth development boundary south of the A458. This is significantly larger than Stanmore Business Park (17ha) and constitutes a mechanism by developers to 'jump' the bypass and create huge housing estate that is disproportionate, undesirable & detrimental. Considering additional 11 ha Stanmore allocation – 40 ha total employment land earmarked for Bridgnorth. Question evidence for 40ha requirement & how predicted levels of employment growth are achievable given: Bridgnorth's poor infrastructure & accessibility; close proximity of Telford which has established industrial role and good transport connections; evidence of lack of demand for employment land ( only 10% of available land in Bridgnorth has been developed since 2000); current empty units with evidence needed of vacancy rates; impacts of Covid19 on businesses.
A0235	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0235	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25, & S3 (BRD030)	Not Specified	No	Not Specified	Road & highways are fundamental to Local Plan decision making which needs robust up to date evidence. This was not available as the Transport Plan 2011-2016 is under current review and needs to be completed to inform Local Plan decisions. Existing A roads to surrounding larger towns are slow single carriageway. Poor road communications do not make it attractive for SME business set up. Bridgnorth is subject to significant topographical and landscape restraints and river crossing limitations which severely restrict development options and road improvement opportunities and impact on accessibility. Evidence from the Town Council & Parish Council steering group planning for Bridgnorth identified in 2019 significant issues regarding the ability of local infrastructure, transport links and public services and facilities to support economic & population growth without significant investment. Current Local Transport Plan confirms this view – sections 2.2 & 4.6.3 illustrate. There are high levels of inward and outward commuting ( 60% Bridgnorth residents out & similar number from outside in ) Proposed sites at Tasley separate residential development from main employment locations and , notwithstanding some employment provision, many will commute to better paid jobs elsewhere in the West Midlands where they may currently be resident. Current Local Transport Plan sections 2.3 & 2.4 acknowledges commuting trend and increasing influence of Telford on Shropshire. No evidence for proposals encouraging highly paid workers to move to Bridgnorth. Estimate, conservatively that new developments at Tasley will increase vehicle movements through additional 2250 resident's vehicles with additional commercial vehicle movements associated with employment at Tasley. Developers own transport review indicates that 75% of peak hour traffic from their site will travel east on A458 to Telford, Wolverhampton, Kidderminster and Stourbridge. Traffic increase despite long term lack of investment in roads & public transport decline. Good communications necessary to support sustainable community but no strategic investment proposed. Increased traffic will impact on of environment & quality of life as documented in section 2.7 Transport Plan to the detriment of attractiveness as location to attract workers & businesses. Agricultural nature of locality generates traffic associated with this industry (with seasonal peaks) which will increase danger roads Footbridge essential to provide crossing of dangerous A458 but no certainty of delivery as developer does not have control of land needed. Site a long walk from town centre for parent with child
A0235	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 S3 & BRD030	Not Specified	No	Not Specified	Response highlights requirements of parts 1 & 2 of Policy DP17 (Landscape & Visual Amenity) & that Para 19 Appendix 2 to the 20th July 2020 Cabinet report stated that the garden village is located within an area of medium/medium- high landscape sensitivity. Parts 4, 7, 8 of DP18, paras 4.167, 4.171 of the pre-submission draft Plan in relation to the loss of agricultural land; potential noise, odour and air quality issues (AQMA) and ammonia/nitrate & other ecological concerns ( including SSSI Impact Risk Zones, priority habitats and environmental network ) identified in paras 22, 23 & 35 of Appendix 2; are also referenced.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0235	B003	SC needs to provide following information for discussion: details of vacancies, locations, time unoccupied etc; evidence that employment growth is achievable, including consideration of Covid 19; evidence to substantiate requirement for additional 27ha in addition to that already allocated; where employment growth not achieved what will the alternative use of land/buildings be & what consideration has been given to uncertainties re changing workplace /employment demands/demographics following Covid 19 on demand for housing, commercial premises and other aspects of life?	Noted. Shropshire Council has undertaken an Economic Development Needs Assessment and Employment Land Review to inform the Local Plan Review. The Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Specifically with regard to employment land, this proposed strategy provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Having a supply of land which creates choice and competition in the market provides flexibility to respond to changing circumstances.	No
A0235	B004	Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030. Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision. Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators." Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.	No
A0235	B005	Clarify plans for road infrastructure improvements which are needed to support employment growth and reach stated targets. Clarification needed of how footbridge provision or alternative A458 crossing will be ensured, including necessary land purchase.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458. Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.	No
A0235	B006	Seek clarification as to: •whether assessment of landscape and visual impacts by appropriately qualified professional has been carried out and published and if not why? •Why given, threat to local food production, grade 3 agricultural land being used for development & what evidence of consideration given to likely increased demand for UK food production due to BREXIT? •whether noise assessment, particular in relation to additional vehicles on A458, by appropriately qualified specialist has been carried out and published and if not why? •What measures will be taken to improve Bridgnorth air quality in the light of increased vehicular movement? •How noise and odour can be successfully mitigated? •Justification for BRID010 in light of known ecological damage and what safeguarding measures can be put in place?	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal. Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology. Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0235	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3 BRD030	Not Specified	No	Not Specified	<p>Site residential allocation in contradiction with previous rationale for relocation of livestock market when previously stated in approving SAMDev Plan that livestock use incompatible with housing.</p> <p>Inconsistency between schedule S3.1 (1) which indicates that poultry units operating on the site will cease &amp; para 34, Appendix 2 of 20th July Cabinet report which indicates that planning permission for poultry units would not be implemented if site allocated. Additionally legal agreement to prevent residential development if poultry farm in operation, as referenced by officers at Regulation 18 Cabinet meeting, has not been made. Therefore, the Garden village residential development could proceed in vicinity of both livestock market &amp; poultry farm.</p> <p>Under DP18 intensive livestock units may require HRA.</p> <p>Para 35, Appendix 2 of 20th July Cabinet report references capacity for appropriate management of current and future noise and odour, including from road, relocated livestock market &amp; commercial uses, but no details of how this will be achieved ,what timescales are or consideration of animal waste/run off ground contamination or noise &amp; odour impacts of poultry units.</p>
A0235	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3 BRD030	Not Specified	No	Not Specified	<p>Community engagement has been limited compared to SCI requirements &amp; was inadequate. Consultation on competing schemes at Tasley &amp; Stanmore is not comparable. Unexpected late emergence of Tasley proposal and impact of Covid 19 relied on online consultation and prevented satisfactory engagement, involvement and consideration, including public debate in meetings and developer feedback. No account has been taken of large number of Reg 18 objections, including from elected bodies/ representatives, to Bridgnorth proposals and no feedback on reasons has been provided. Proposals do not take into account Draft Bridgnorth Steering Group Report published May 2020 which was prepared by Town and Parish Councils to consider settlement issues and develop plan for Bridgnorth.</p>
A0236	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2	Not Specified	No	Not Specified	<p>Do not consider the draft Shropshire Local Plan is sound or sustainable.</p> <p>Do not agree with the methodology adopted in the Hierarchy Assessment as applied to Longden. Specific concerns addressed within the Longden Village Action Group (LVAG) Regulation 18 response.</p> <p>Unclear why sites previously rejected/refused at appeal are considered.</p>
A0237	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2	Not Specified	No	Not Specified	<p>Do not consider the draft Shropshire Local Plan is sound or sustainable.</p> <p>Do not agree with the methodology adopted in the Hierarchy Assessment as applied to Longden. Specific concerns addressed within the Longden Village Action Group (LVAG) Regulation 18 response.</p> <p>Unclear why sites previously rejected/refused at appeal are considered.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0235	B006	<ul style="list-style-type: none"> <li>•Provide explanation, given SAMDev rational for relocation of livestock market, why potential co-location of livestock use and residential use is now acceptable?</li> <li>•Clarify why any legal agreement relating to poultry units has not been made publicly available? If not in place how will poultry unit use be restricted once garden village development has started?</li> <li>•Provide full noise &amp; odour impact report &amp; details of mitigation.</li> <li>•Preparation of ground contamination study and impact report required</li> </ul>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0235	B007	<ul style="list-style-type: none"> <li>•Explanation of why locally elected bodies and representatives have been ignored</li> <li>•Delay decision on legal compliance and soundness of the Local Plan until soundness issues raised are addressed and alternative options considered</li> </ul>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No
A0236	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach.</p> <p>In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.</p>	No
A0237	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach.</p> <p>In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0238	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.35	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0238	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0239	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0239	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0240	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.36	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0240	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0241	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.37	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0241	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0242	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0243	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0242	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0243	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0244	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0245	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0244	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0245	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0246	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.38	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0246	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0247	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.39	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0247	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0248	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0248	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0249	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.40	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0249	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0250	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.41	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0250	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0251	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0252	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0251	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0252	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0253	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0254	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0253	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0254	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0255	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Not Specified	Not Specified	Not Specified	Have chosen not to express concern about some of the draft general and strategic policies in the draft Shropshire Local Plan, but are concerned that these draft Policies appear to be ignored when in apparent conflict with more detailed draft Policies - such as the employment allocations at Stanmore. Remain incredulous that protection of the Green Belt is not expressed as a major strategy in the draft Shropshire Local Plan.
A0255	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 (STC002 and P58a)	Not Specified	No	Not Specified	Consider the draft Shropshire Local Plan is unsound. The proposed employment development at Stanmore (STC002 and P58a) conflicts with most of the issues set out in draft Policy DP18 because they are in "countryside", in the Green Belt and distant from significant areas of residential development. The local environment is relatively calm/quiet, it is identified as Grade 3 agricultural land (adjoining Grade 2 so likely Grade 3a) and there is good air quality. Note Appendix 6 of the draft Shropshire Local Plan includes a note indicating Bridgnorth is a preferred site (though unspecified) for 'recycling and environmental industries'. This is very concerning if it is intended to imply Stanmore would be a suitable place to locate recycling or environmental industries. This site is entirely inappropriate for such industries (Green Belt and open countryside). There is current experience in the near vicinity of such operations causing difficulties. The proposed employment development at Stanmore is unjustified and un-evidenced. It will, in fact add to local pollution issues and would harm public amenity.
A0255	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1(i)	Not Specified	Yes	Not Specified	Proposals advanced in draft Policy S3.1(i) as far as the housing development in the proposed Garden Village at Tasley is concerned, are supported. The inclusion of employment land and community facilities and open amenity land in the project is also supported as this will ensure a sustainable development. Campaigned against the proposed Stanmore Garden Village, which is no longer proposed for allocation when a better site Tasley Garden Village (BRD030), outside the Green Belt and compliant with National Policy, emerged. Tasley Garden Village is included within the draft Shropshire Local Plan and whilst sceptical of the scale of growth proposed for Bridgnorth as a whole, support this proposal. The draft Shropshire Local Plan proposes only employment development at Stanmore, and so that is all we may comment upon. Appreciate other parties are likely to object to Tasley Garden Village and may attempt to re-open the prospect of Stanmore Garden Village and that this may be a topic at Examination. If the idea of "new village" should a) not be sited at Tasley and/or b) should again be sited at Stanmore, would expect an opportunity to make further written submissions/attend the Examination.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0255	B001	N/A	<p>Noted. The draft Shropshire Local Plan has been informed by a proportionate and robust Green Belt Assessment and Green Belt Review. Draft Policy SP11 of the draft Shropshire Local Plan addresses the Green Belt.</p> <p>The proposed strategic approach to the level and distribution of development and proposed development strategies for individual settlements are considered to have given due consideration to the Green Belt.</p> <p>Proposed allocations have been informed by a proportionate and robust site assessment process, which, where appropriate, included consideration of the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0255	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan and the land remain as Green Belt.	<p>Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). They are consistent with relevant draft Policies within the draft Shropshire Local Plan.</p> <p>Identification of proposed allocations was informed by a proportionate and robust site assessment, which included consideration of public protection issues, agricultural land quality and Green Belt.</p> <p>Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications.</p>	No
A0255	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan and the land remain as Green Belt.	<p>Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0255	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Consider the draft Shropshire Local Plan is unsound.</p> <p>There does not appear to be any justification or evidence for the level of employment land provision proposed in the Review, for Bridgnorth:</p> <ul style="list-style-type: none"> <li>-No explanation is provided of the need for the total proposed employment land supply for Bridgnorth (40.5ha), how the stated capacity of saved SAMDev Plan allocations (8.25ha) was arrived at, or where proposed new allocations are to be located (27.4ha of new allocations) - as documented in Appendix 6 of the draft Shropshire Local Plan.</li> <li>-No explanation/justification of why employment land should be located at Bridgnorth and in particular Stanmore, which is dissociated from Bridgnorth, cannot be accessed (reasonably) on foot or cycle from the town, and is inadequately served by public transport (most accessing the existing site use the motor car). No suggestion that proposed employment allocations at Stanmore would do anything other than make the present situation worse. No justification exists.</li> <li>-No explanation of why a planned increase to the proposed housing guideline for Bridgnorth from (1,400 dwellings in the adopted Local Plan to 1,800 dwellings in the draft Shropshire Local Plan) should result in a requirement for 40.5ha of employment land (27.4ha of new allocations).</li> <li>-Also no explanation of why the increase in the number of dwellings at Shrewsbury (as the Strategic Centre) - 5 times the increase proposed at Bridgnorth, requires less than 3 times the increase in employment land proposed at Bridgnorth (especially as from 2016 to 2019 (first three years of the proposed Plan period) delivery of employment land in Shrewsbury was around 13 times greater than Bridgnorth, a clear indication of greater need and demand).</li> <li>-The Bridgnorth Market Towns Profile prepared by Shropshire Council (no doubt considered during preparation of the draft Shropshire Local Plan) revealed Bridgnorth was the third largest town in Shropshire and the Parishes population was projected to increase by 2,300 by 2026. But this increase has not resulted in increased pressure for employment land release/development. Indeed, if anything, Bridgnorth has been losing employment opportunities in the recent past, even though allocated land with ready access, has existed. Data from the Market Town Profile suggests why there is no great pressure for additional employment land (despite 9.2% reduction in numbers of jobs over the five years to 2017, whilst the Shropshire average was a rise of 2.9%) - lack of need rather than lack of land as: the population is generally older than the rest of Shropshire, thus there are less economically active persons living in the town; and those that are of working age are mostly in employment.</li> </ul> <p>There is no immediate need for new allocated employment sites, but Appendix 7 of the draft Shropshire Local Plan indicates land at Stanmore will come forward 2020/21-2024/25. No evidence to suggest this land is necessary in the short term, or that there is excessive and immediate demand that cannot be accommodated other than on the Green Belt land at Stanmore. There can be no certainty that, if allocated, the land would be developed (given a large percentage of the existing industrial estate has not been developed) or that it would generate significant job opportunities. The fact that the proposed allocations would also represent incursions into Green Belt and open countryside means the proposals conflict with national policy as set out in the NPPF.</p> <p>Does not appear that the proposed extensions to the Stanmore Industrial Estate have been based on an objectively assessed need for the development or that there is any evidence to support the allocations.</p> <p>The draft Shropshire Local Plan cannot be considered "sound" due to the proposed employment allocations at Stanmore (Sites STC002 and P58a). Consider the proposal to develop these sites for employment uses represents unjustifiable and unnecessary extensions of industrial development into the Green Belt, which conflicts with other draft policies in the draft Shropshire Local Plan which establish general development principles. There is a lack of evidence of need for these proposed allocations; nothing demonstrates that the provision of more employment development at Stanmore is so pressing that Green Belt principles should be set aside.</p>
A0255	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Consider other draft Policies in the draft Shropshire Local Plan conflict with the aims of draft Policy SP1. This means the plan will not be effective in delivering the aims of draft Policy SP1. For example, proposed allocations at Stanmore Industrial Estate (STC002 and P58a) conflict with draft Policy SP1 as they will not support health and well-being of any particular community, will not contribute to creating or maintaining any cohesive community, will have little if any positive effect on climate change, will not preserve or enhance any natural environment, will not raise design standards or enhance the County's character or historic environment, it has not been demonstrated that it will make efficient use of land – as the sites proposed are greenfield it is questionable whether they can be regarded as being more efficiently used for employment purposes, and it is highly unlikely any future proposals for the sites will provide any level of infrastructure that goes beyond the minimum necessary for the proposal in hand.</p> <p>STC002 and P58a conflict with draft Policy SP1 which states "development will contribute to meeting local needs and making settlements more sustainable". Employment needs of the small settlement at Stanmore (clearly regarded as a separate settlement by Shropshire Council as it was previously proposed for a new garden village) would not support the existing Stanmore Industrial Estate, let alone further additions. As such the sites do not meet any identified local need and would not make Stanmore more sustainable.</p> <p>STC002 and P58a have not been positively prepared as it will not meet the area's assessed need, is not justified or evidenced as there is no need for the development, will not be effective because there is no evidence to demonstrate that the allocations will be taken up in the short term when it is clear that operators are moving away from the Estate, and is in clear conflict with national policy as the proposed sites are located in open countryside and in Green Belt. As such it conflicts with para 35 of the National Planning Policy Framework (NPPF).</p> <p>The issue of conflict between draft Policies, and in particular with draft Policy SP1, is a recurring matter in the draft Shropshire Local Plan.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0255	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan and the land remain as Green Belt.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0255	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan and the land remain as Green Belt.	<p>Noted. Shropshire Council considers that the draft Policies of the draft Shropshire Local Plan are consistent and together provide an appropriate vision and framework for the future development of Shropshire to 2038; address needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seek to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0255	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 (STC002 and P58a)	Not Specified	No	Not Specified	<p>To deliver the proposed employment land requirement (300ha), a greater figure is likely to be needed to allow for allocated sites not coming forward or land with planning permission not being actually developed in the Plan period. Difficult to work out precisely what the need for employment land is in the County.</p> <p>The Economic Development Needs Assessment (EDNA) undertaken to inform the draft Shropshire Local Plan estimates need for between 162ha and 264ha (gross) of employment land, suggesting an over-supply of employment land. However, Appendix 6 of the draft Shropshire Local Plan indicates a strategic land supply of 414ha is necessary, but no explanation of this or why each constituent figure is so high is provided, as such this level of provision is unjustified.</p> <p>300ha of employment land appears an aspirational target rather than one actually based on identified need and making settlements more sustainable. This extends to proposed allocations of STC002 and P58a in a settlement that has no need for further employment provision - Appendix 6 of the draft Shropshire Local Plan indicates 27.4ha of additional employment land will be allocated in Bridgnorth, but does not explain why this is necessary (it is also probably undeliverable), given only 1.2ha of land was developed in the first three years of the Plan period.</p> <p>The EDNA also indicates demand is likely to be centred on the A5/M54 corridor - Bridgnorth is peripheral to this, again suggesting demand is going to be limited in Bridgnorth. Emphasis in draft Policy SP2 is on meeting local need. Even if proposed allocations at Stanmore (STC002 and P58a) are intended to cater for Bridgnorth town rather than Stanmore itself, clear they are unnecessary. The draft Shropshire Local Plan does not evidence a quantitative or qualitative demand that might be used to justify development at Stanmore and thus loss of Green Belt. Given the amount of available but undeveloped/unused employment land in the town and, in particular, at Stanmore, the allocations that exist and are to be carried forward from the SAMDev Plan and the additional allocation being proposed in association with the Garden Village/Sustainable Urban Extension at Tasley, there is clearly no need for further allocations to serve the employment needs of Stanmore, or Bridgnorth.</p> <p>Stanmore is in the open countryside and West Midlands Green Belt (outside any Principal or Key Centre, or Community Hub or Cluster). Draft Policy SP2.6 says outside such settlements "new development will consist of affordable housing where there is evidence of local needs and appropriate rural employment and economic diversification". Draft Policy SP2.6 does not support the proposed allocation of 11.5ha of unneeded employment land at Stanmore, as they are not "appropriate rural development or economic (rural) diversification", as such STC002 and P58a conflict with this draft Policy.</p> <p>STC002 and P58a conflict with draft Policy SP2 and are not considered sound as defined in para 35 of the National Planning Policy Framework (NPPF).</p>
A0255	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4 (STC002 and P58a)	Not Specified	No	Not Specified	<p>To be effective, all policies should complement/be consistent with each other and National Policy.</p> <p>The National Planning Policy (NPPF) seeks to protect the Green Belt unless exceptional circumstances that are fully evidenced and justified, through preparation of Local Plans. No evidence/exceptional circumstances exist to justify development of STC002 and P58a - the Council's Green Belt Release Exceptional Circumstances Statement do not identify any circumstance which is exceptional and as such the sites should not be allocated.</p> <p>Currently, very special circumstances would need to be demonstrated to justify development of STC002 and P58a. An unjustified allocation should not be used to circumvent this. Such development would be unsustainable and would be in conflict with draft Policy SP4.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0255	B006	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan and the land remain as Green Belt.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan.</p> <p>With regard to this evidence, we would note that calculations of the employment land requirement are based on the national assumption that employment land when developed, delivers 40% net floorspace from the gross land area, and that new employment is generated on that basis. However, available evidence suggests that employment land when developed, delivers on average 25% net floorspace in Shropshire. This has been given careful consideration when determining an appropriate employment land requirement. Furthermore, we would also note that the proposed employment land requirement actually represents a reduction to that within the adopted Local Plan (whilst the housing requirement has actually increased).</p> <p>The proposed employment land requirement incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan, where evidence indicates employment delivery opportunities are constrained. This reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas.</p> <p>In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement.</p> <p>It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0255	B007	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan and the land remain as Green Belt.	<p>Noted. Shropshire Council considers that the draft Policies of the draft Shropshire Local Plan are consistent and together provide an appropriate vision and framework for the future development of Shropshire to 2038; address needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seek to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0255	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Not Specified	Yes	Not Specified	Proposals advanced in draft Policy SP6 as far as the housing development in the proposed Garden Village at Tasley (BRD030) is concerned, are supported. Inclusion of employment land and community facilities and open amenity land in the project is also supported as this will ensure a sustainable development.
A0255	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8 (STC002 and P58a)	Not Specified	Yes	Not Specified	Stanmore (STC002 and P58a) is not enclosed within the proposed Bridgnorth development boundary and is not a proposed Community Hub. As such is not subject to draft Policy SP8 but rather draft Policy SP10. Proposed development of STC002 and P58a conflicts with draft Policies SP2 and SP10 which indicate development in the rural area will be focussed on Community Hubs and Community Clusters. These proposed allocations are neither justified nor evidenced and will not be effective in achieving the aims of the Local Plan.
A0255	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9 (STC002 and P58a)	Not Specified	Yes	Not Specified	Stanmore (STC002 and P58a) is not enclosed within the proposed Bridgnorth development boundary and is not a proposed Community Cluster. As such is not subject to draft Policy SP9 but rather draft Policy SP10. Proposed development of STC002 and P58a conflicts with draft Policies SP2 and SP10 which indicate development in the rural area will be focussed on Community Hubs and Community Clusters. These proposed allocations are neither justified nor evidenced and will not be effective in achieving the aims of the Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0255	B008	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan and the land remain as Green Belt.	<p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Furthermore, proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, informed by a proportionate and robust Green Belt Review.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p>	No
A0255	B009	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan and the land remain as Green Belt.	<p>Noted. Shropshire Council considers that the draft Policies of the draft Shropshire Local Plan are consistent and together provide an appropriate vision and framework for the future development of Shropshire to 2038; address needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seek to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0255	B010	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan and the land remain as Green Belt.	<p>Noted. Shropshire Council considers that the draft Policies of the draft Shropshire Local Plan are consistent and together provide an appropriate vision and framework for the future development of Shropshire to 2038; address needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seek to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0255	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	The draft Shropshire Local Plan is unsound and not in compliance with national policy. Draft Policy SP10 conflicts with the aims of other draft Policies in the draft Shropshire Local Plan. Proposed allocations STC002 and P58a encroach on open countryside and the Green Belt. This land is not within a Strategic, Principal or Key Centre, Strategic Settlement or Community Hub/Cluster. It also does not fall into any of the categories of development that might be acceptable in the Green Belt, as set out in draft Policy SP10.3. STC002 and P58a are unjustified, not evidenced and would be in conflict with the aims of draft Policy SP10 and therefore are not sound as defined in para 35 of the National Planning Policy Framework (NPPF).
A0255	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	The draft Shropshire Local Plan is unsound and not in compliance with national policy. It purports to support restrictions on development in the Green Belt, but also proposes release of some 11.5ha (STC002 and P58a) at Stanmore for unidentified employment uses. Draft Policy SP11 says Green Belt will be protected against inappropriate development, as defined by national policy. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Removing STC002 and P58a from the Green Belt removes the need to demonstrate 'very special circumstances', this is not made clear in draft Policy SP11, or the following explanatory paragraphs, but ought to be. The draft Policies Map shows both the existing Stanmore Industrial Estate and STC002/P58a, as being excluded from the Green Belt. This is misleading as at present, STC002 and P58a are included within the Green Belt. The text of draft Policy SP11 and the draft Policies Map should make this difference clear. Justification for removing proposed allocations STC002 and P58a from the Green Belt is not clear. Unless specific exceptional need for this development exists and exceptional circumstances are demonstrated, they should not be removed from the Green Belt. Even if removed from the Green Belt, draft countryside Policy would still apply. The Green Belt Exceptional Circumstances Statement prepared to inform the draft Shropshire Local Plan was produced late in the Local Plan process and appears to be aimed at explaining proposed allocations rather than being the basis for decisions. For STC002 and P58a do not consider the factors identified in themselves represent exceptional circumstances - similar factors likely exist elsewhere. No detailed evidence of past/future impact of these issues and no explanation of why they could not be satisfied elsewhere on sites outside the Green Belt is provided. Also note the Council consider availability of land have impacted on delivery of employment, but no evidence is presented to substantiate this (reference is made to special circumstances which have delayed delivery of current employment allocations, but it is not made clear what these are or how they can be rectified). No exceptional circumstances were provided in the Regulation 18 consultation document (reference is made to a Green Belt Review but this assesses harm to the Green Belt and does not identify exceptional circumstances). Consider STC002 and P58a have long term implications for the Green Belt (including adversely affecting the openness of the Green Belt and encroachment of the countryside). No exceptional circumstances in terms of imperative/urgent need for additional employment land in Stanmore/Worfield Parish/Bridgnorth town; need for a particular employment operator is in need of additional land adjoining an existing operation that cannot be moved elsewhere; or that an operator has special requirements that cannot be met anywhere other than on the proposed allocated sites, is provided. Same arguments presented could be provided at a future Local Plan Review. Also no evidence of the need for this amount of land and the need for two sites (opposite ends of the existing estate, stretching into Green Belt). Case law has established suitability of land for a particular use does not on its own constitute exceptional circumstances (see Gallagher Homes Ltd v Solihull DC [2014] EWCA 1610), the same logic would mean lack of harm to the Green Belt also does not itself constitute an exceptional circumstance. No evidence provided that all land and buildings at Stanmore have been developed and let. There are several buildings that are empty, and areas of land that have never been developed for commercial purposes. Consider proposed allocations STC002 and P58a are contrary to the National Planning Policy Framework (NPPF) including para 35, unsustainable, unjustified and unevidenced and there is no guarantee they will actually be delivered.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0255	B011	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan and the land remain as Green Belt.	<p>Noted. Shropshire Council considers that the draft Policies of the draft Shropshire Local Plan are consistent and together provide an appropriate vision and framework for the future development of Shropshire to 2038; address needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seek to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0255	B012	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan and the land remain as Green Belt.	<p>Noted. Shropshire Council considers that the draft Policies of the draft Shropshire Local Plan are consistent and together provide an appropriate vision and framework for the future development of Shropshire to 2038; address needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seek to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design.</p> <p>Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development (as defined in the NPPF) within Green Belt, with this being a necessary consideration for planning applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 &amp; special circumstances requirements would not be applicable.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0255	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 (STC002 and P58a)	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan is unsound.</p> <p>There is conflict between draft Policy SP12 and other draft policies in the draft Shropshire Local Plan. Draft Policy SP12 will not be effective. For instance it seeks to focus development in Shrewsbury, Principal/Key Centres, Strategic corridors/settlements/sites, Community Hubs and Community Clusters. However, sites STC002 and P58a are proposed for allocation and not located in any of these locations/does not fulfil this criteria, rather they are in the open countryside/Green Belt, adjacent to an existing isolated Industrial Estate and in agricultural use. As such STC002 and P58a conflict with draft Policy SP12.</p> <p>Consider proposed allocations STC002 and P58a are contrary to the National Planning Policy Framework (NPPF) including para 35, unjustified and unevidenced and there is no guarantee they will actually be delivered. These sites should be deleted to ensure compliance with draft Policy SP10.</p>
A0255	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13 (STC002 and P58a)	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan is unsound.</p> <p>Draft Policy SP13 is not fully evidenced or justified, and conflicts with the aims of other draft Policies.</p> <p>Query justification for and deliverability of proposed employment land requirement. This equates to around 14ha per annum, but past delivery (2016-2019) is only 10.7ha per annum (meaning there is already a shortfall). No particular factors are evidenced to guarantee increased need and lack of delivery has not been caused by a lack of sites/planning permissions (land on existing employment area/allocations amounts to 239ha which is in theory readily developable). As such, there is little need for the 142ha of newly proposed allocated employment land.</p> <p>Para 3.d of draft Policy SP13 includes that proposals should satisfy requirements of national and local policy, including protection of the Green Belt except where there are very special circumstances. STC002 and P58a are located in the Green Belt, there allocation conflicts with para 3.d of draft Policy SP13 and no very special circumstance has been advanced. There proposed allocation appears a means of side-stepping requirements of para 3.d of draft Policy SP13.</p> <p>Consider proposed allocations STC002 and P58a are contrary to the National Planning Policy Framework (NPPF) including para 35.</p>
A0256	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0256	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0255	B013	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan and the land remain as Green Belt.	<p>Noted. Shropshire Council considers that the draft Policies of the draft Shropshire Local Plan are consistent and together provide an appropriate vision and framework for the future development of Shropshire to 2038; address needs and opportunities in relation to housing, the local economy, community facilities and infrastructure; and seek to safeguard the environment, enable adaptation to climate change and helps to secure high-quality and accessible design.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0255	B014	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan and the land remain as Green Belt.	<p>The economic strategy in the draft Shropshire Local Plan seeks to balance new economic development and employment generation with the delivery of new housing, focused within the strategic and principal urban centres of Shrewsbury, the Market Towns and Key Centres of the County. This balance between the two principal aims of the draft Local Plan seeks to ensure that key economic objectives of the strategic approach in Policy SP2 will be met: providing for the delivery of a growing and diverse labour force; and in turn, supporting the delivery of an improving rate of economic growth and an increase in the productivity of the local economy. This balancing approach in the spatial strategy for new economic development and employment generation targets new economic development opportunities principally into Shrewsbury and the principal centres with an increase in provision in the east of the County. This will improve the economic potential of the County particularly within significant commuting locations with higher concentrations of resident labour and with higher levels of skills and academic attainment. This increased urban focus in the economic strategy of the draft Local Plan also seeks to capture the greater opportunity in urban markets to achieve more efficient development of employment land. This is expected to deliver higher proportions of developed floorspace and employment from the land that is developed in the County. This urban focused strategy will also locate a greater proportion of the new employment development into those urban centres located along the strategic corridors through the County, helping to improve the accessibility and sustainability of Shropshire's key employment locations over the plan period to 2038. This is expected to assist in retaining more of the County's resident labour force and helping to improve the productivity of the Shropshire economy. The increased concentration of new economic development and employment generation in the centre and east of the County will also enable Shropshire to increase its profile and investment offer beyond the County boundary. This will be achieved by providing a broader range and choice of both housing and economic development opportunities that are accessible to other key economic and employment markets. This will include locations in the sub-regional area, in need of additional support to meet their own economic needs and demands, which will further help to improve the economic growth potential of the County.</p>	No
A0256	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0256	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0256	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0256	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0256	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0257	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002/P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0256	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0256	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0256	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0257	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0257	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0257	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0258	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0258	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0257	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0257	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0258	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0258	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0258	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0258	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0258	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0259	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0259	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0258	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0258	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0258	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0259	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0259	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0259	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0259	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0259	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0260	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0260	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0259	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0259	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0259	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0260	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0260	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0260	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0260	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0260	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0261	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002/P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0261	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0260	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0260	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0260	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0261	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0261	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0261	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0261	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0261	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0261	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0261	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0261	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0262	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 (WHT037 and WHT044)	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan is unsound as it fails to fully address surface water flooding and concentrates the sequential test on fluvial flooding, to the extent that the sequential approach to surface water flooding has been missed. As such, do not consider that the flood risk sequential test adequately (in line with National Planning Policy Framework (NPPF) policy and guidelines) considers all sources of flooding, including surface water.</p> <p>Proposed allocations WHT037 and WHT044 are unsound. Whilst these sites are not located in flood zones 2 or 3, they suffer from considerable surface water (pluvial) flooding. This is evidenced in:</p> <ul style="list-style-type: none"> <li>-The Environment Agency surface water flooding map (extract appended to representation) which shows a sizeable area of high surface flood risk in the central area of the two sites and along the watercourse that skirts around the Grove Estate on Tarporley Road;</li> <li>-Photograph of past flooding (appended to representation);</li> <li>-Site geology;</li> <li>-Written evidence from 30+ local households (within the Regulation 18 consultation);</li> <li>-Local knowledge as this area is recognised as being very wet; and</li> <li>-Past flood events in the area, exacerbated by recent construction. Development causes concentration of water which previously percolated into the ground, which is surfacing at lower level weak points and inundating homes and gardens.</li> </ul> <p>New development sites at Oak Tree Way and the Beeches (adjacent to WHT037 and WHT044), have caused flood issues. An outstanding application (18/02583/FUL) validated in July 2018 remains for construction of storm drainage on Oak Tree Way, comments on this application document the major flooding problems residents in the Chester Road area experience, but the developer has sold all associated plots and moved on.</p> <p>Do not want existing problems to be further exacerbated by development. No comfort in proposals to include appropriate sustainable drainage as they don't work well, even if they happen, and result in ongoing issues once the developer has departed as per Oak Tree Way and the Beeches. The developer should be required to demonstrate necessary investigations and modelling has occurred and WHT037 and WHT044 are suitable for development during examination, rather than the local Councillor and residents arguing the case to prevent increased flood risk to existing properties.</p> <p>Page 61 of the level 1 Strategic Flood Risk Assessment (SFRA) recognises the surface water flood risk associated with runoff from high-ground to the unnamed watercourse which flows into Grindley Brook - this is the Chester Road area associated with WHT037 and WHT044.</p> <p>Awaiting a response to a Cabinet Question on infrastructure and facility deficiencies in Whitchurch. As such, reserve the right to produce further information evidencing deficiencies of infrastructure and utilities to sustain new development in Whitchurch.</p>
A0263	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0263	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>
A0263	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a.</p> <p>Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites.</p> <p>Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'.</p> <p>If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0262	B001	Removed proposed allocations WHT037 and WHT044 from the draft Shropshire Local Plan. Retain the existing development boundary as illustrated on plans appended to this representation.	Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity. The Council considers that the risk of flooding from all sources has been adequately and appropriately assessed through the Strategic Flood Risk Assessments (Stages 1 and 2) and that the Sequential and Exception Tests (based on the SFRA-1 and SFRA-2) are compliant with national planning policy and guidance. We would also note that neither the Environment Agency or Welsh Water have objected to this proposed allocation.	No
A0263	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0263	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0263	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0263	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0263	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>
A0264	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Bridgnorth - STC002 / P58a	Yes	No	Yes	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0264	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 and STC002/P58a	Yes	No	Yes	<p>Policy SP1 requires development to contribute to meeting local needs or to making settlements more sustainable. The aims of this policy are not translated into the aims of other policies in the Plan Review, in particular the proposed industrial allocations at Stanmore. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. Policy SP1 is not based on sound evidence and is not justified as a sound basis for the development of more detailed policies in the Plan.</p>
A0264	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 and STC002/P58a	Yes	No	Yes	<p>Policy SP10 would restrict economic development in rural areas in line with national guidance to ensure economic development proposals are only allowed where they maintain or enhance countryside vitality and character. The employment sites proposed at Stanmore are in the countryside and are accessed through an established country park. The Council, and the Stanmore residents have sought to preserve the character of this area and the designation of the land for many years. There is no guarantee the proposed allocations will protect this situation and so the allocations are an attempt to side-step Policy SP10 in any future development. The countryside at Stanmore should continue to be protected similar to other rural areas in Shropshire and consequently the need for these proposed allocations is not justified and not properly evidenced.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0263	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0263	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0264	B001	Sites STC002 and P58a allocated for employment development at Stanmore - should be deleted from the Plan. There is no requirement to identify an alternative site.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0264	B002	Sites STC002 and P58a allocated for employment development at Stanmore - should be deleted from the Plan to ensure the compliance of Policy S3.1 with Policy SP1 The Shropshire Test.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0264	B003	Sites STC002 and P58a allocated for employment development at Stanmore - should be deleted from the Plan to ensure the compliance of Policy S3.1 with Policy SP10 Managing Development in the Countryside	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0264	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 and STC002/P58a	Yes	No	Yes	Policy SP11 sets out to protect the Green Belt from 'inappropriate development' which detracts from the fundamental aims to preserve the openness and ensure the permanence of Green Belts in accordance with national policy. The release of 11.5ha of land from the Green Belt at Stanmore for industrial or storage uses with the construction industrial buildings could not fail to have an adverse effect on the Green Belt which will continue to surround the proposed allocated sites. It is likely therefore, that if approved, this allocation could also be used for further unjustified incursions into the Green Belt in the future. The sites now proposed for employment development at Stanmore are located within the Green Belt and the Council propose to remove this protection without any exceptional circumstance being demonstrated. The National Planning Policy Framework says, at para 145, that local planning authorities should regard the construction of buildings as being inappropriate in the Green Belt, unless they are for certain, specified, uses - none of which include new development for industrial purposes. There is no indication of the types of businesses which might locate at Stanmore, and so the proposals appear to be a device to ensure that future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11 particularly to demonstrate very special circumstances for development to be permitted. This proposed release of land from the Green Belt has not been justified, and the need for the land to be made available for employment development has not been evidenced.
A0265	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0265	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0265	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0264	B004	Sites STC002 and P58a allocated for employment development at Stanmore - should be deleted from the Plan to ensure the compliance of Policy S3.1 with Policy SP11 Green Belt and Safeguarded Land	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself.</p> <p>The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable.</p> <p>The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page.</p> <p>Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.</p>	No
A0265	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0265	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0265	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself.</p> <p>The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable.</p> <p>The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page.</p> <p>Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.</p>	No



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A0265	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0265	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>
A0266	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0266	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>
A0266	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from ‘inappropriate development’. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is ‘inappropriate development’, unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a.</p> <p>Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites.</p> <p>Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating ‘very special circumstances’.</p> <p>If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0265	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0265	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0266	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0266	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0266	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0266	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0266	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>
A0267	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0267	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>
A0267	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from ‘inappropriate development’. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is ‘inappropriate development’, unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a.</p> <p>Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites.</p> <p>Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating ‘very special circumstances’.</p> <p>If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0266	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0266	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0267	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0267	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0267	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0267	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0267	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>
A0268	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0268	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>
A0268	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from ‘inappropriate development’. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is ‘inappropriate development’, unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a.</p> <p>Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites.</p> <p>Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating ‘very special circumstances’.</p> <p>If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0267	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0267	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0268	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0268	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0268	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No

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A0268	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0268	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>
A0269	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0269	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>
A0269	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from ‘inappropriate development’. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is ‘inappropriate development’, unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a.</p> <p>Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites.</p> <p>Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating ‘very special circumstances’.</p> <p>If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
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A0268	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0269	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0269	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>
A0270	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0270	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>
A0270	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from ‘inappropriate development’. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is ‘inappropriate development’, unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a.</p> <p>Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites.</p> <p>Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating ‘very special circumstances’.</p> <p>If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.</p>



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A0269	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0270	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0270	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0270	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No



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A0270	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth.</p> <p>Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0270	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>
A0271	B001	Sustainability Appraisal	Sustainability Appraisal	Not Specified	No	Not Specified	<p>Sustainability Criterion 5 (Access to Amenity Green Space) is incorrect for site HNN010. There is an amenity green space on the recreation ground. On the same grounds are the library, leisure centre, children's playground, outdoor sports facility which all score +1.</p>
A0271	B002	Sustainability Appraisal	Sustainability Appraisal	No	No	Not Specified	<p>HNN016 does not conserve and enhance soil reserves; conserve and enhance landscape character; and promote landscape management. As such Sustainability Objective 16 for the site should be double negative (--) rather than 0.</p> <p>HNN016 is located outside the settlement development boundary and the Parish Council consider it very important to prevent housing on the seven valley slopes, particularly as there are more suitable sites available.</p>
A0271	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Introduction (HNN016)	No	No	No	<p>The duty to cooperate has been failed as Shropshire Council has ignored communications, including through a solicitors letter from December 2020 about proposed allocation HNN016.</p> <p>Highley Parish Council resolved not to approve housing development on the eastern side of the ridge running north/south through Highley, which slopes down to the river and is referred to nationally as the Severn Valley. However they would consider development on the western side of the ridge as this would not be visible from the Railway, river or village of Alveley. These views are supported by the local community but the merits of other available sites (namely HNN010 which is considered brownfield land) are ignored to pursue an unsuitable site (HNN016) which is in the Severn Valley and has a dangerous point of access on a bend of the main road.</p> <p>Proposed allocation HNN016 also has an article 4 restricting walls and fences, so how can housing be developed on it?</p> <p>HNN010 is considered a better overall site than HNN016.</p>

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A0270	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0271	B001	Correct scoring of Sustainability Criterion 5 (Access to Amenity Green Space) for site HNN010.	Noted. Access to open space within the Sustainability Appraisal is primarily based on the information provided within the Open Space Assessment undertaken to inform the draft Shropshire Local Plan. This Open Space Assessment does not identify Amenity Green Space on the recreation ground at Highley. However, as noted within the representation there is a significant outdoor sports area, children's playground and young person's area. As such no change is required.	No
A0271	B002	Correct scoring of Sustainability Criterion 15 (relating to Landscape Character) for site HNN016.	Noted. Landscape character within the Sustainability Appraisal is primarily based on the information provided within the Landscape and Visual Sensitivity Assessment undertaken to inform the draft Shropshire Local Plan. This Assessment identifies the parcel containing site HNN016 as having medium landscape sensitivity, which correlates with the scoring applied within the Sustainability Appraisal. As such no change is required.	No
A0271	B003	Enter into dialogue with Highley Parish Council. Change proposed allocation from HNN016 to HNN010. Accept Highley Parish Council's wish to prevent development on the banks of the River Severn, provided the housing guideline is achieved.	Noted. Shropshire Council considers that the proposed development strategy for Highley and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken, which included consideration of issues such as landscape and visual sensitivity, heritage and highways. Site HNN010 (and promoted variations of this site) was considered as part of this assessment.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0272	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0273	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0272	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0273	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0274	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0275	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0274	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0275	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0276	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.42	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0276	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0277	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.43	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0277	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0278	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.44	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0278	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0279	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0279	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0280	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.45	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0280	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0281	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.46	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>
A0282	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0282	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0281	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No
A0282	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0282	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0282	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0282	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0282	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0283	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	No	No	Amenity provision in Cressage (primary school is over-subscribed, doctors surgery is at capacity, no post office (although included within the Hierarchy of Settlements Assessment) and the village pub closed) will not support additional housing. Provision of a small number of 'affordable homes' for local young people who wish to stage in the area is important, but housing for 'non-local' people should not be considered. Brownfield sites in urban areas like Shrewsbury and Telford should cater for housing demand, where proper amenities can be provided. Past Green Belt policies should be re-instated to preserve the beautiful countryside, balance need for housing with farmland/woodland/etc, sustain current property values (loss of open views reduces values).

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0282	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0282	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0282	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0283	B001	The Inspector should: -Assess infrastructure and facilities and realise Cressage cannot cope with large development or support more housing/people. -Evaluate consultation processes, particularly those used during the Covid-19 pandemic which constrained the ability to respond. -Consider previous consultation responses from Cressage residents which were ignored. -Consider objections from Countryside Charities.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub. The proposed development strategy for Cressage and the proposed allocations identified to contribute towards achieving this proposed development strategy are considered appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Proposed allocations have been informed by a comprehensive site assessment process. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0284	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0285	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0286	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Legal Compliance - General	No	No	Not Specified	Council should respond to the following issues before proceeding to approve and submit the Submission Local Plan to the Secretary of State. The issues to be addressed are: (1) the inadequacies with the evidence base used to inform this review process; (2) the methodology applied when calculating Shifnal's employment need, (3) justification on how other sites in Shifnal were ruled out in the sustainability appraisal and (4) the heritage assessment used to inform their site selection process and (5) why SC has chosen to take on the overspill of employment and housing development required by the Black County.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0284	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0285	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0286	B001	Council should respond to the following issues before proceeding to approve and submit the Submission Local Plan to the Secretary of State. The issues to be addressed are: (1) the inadequacies with the evidence base used to inform this review process; (2) the methodology applied when calculating Shifnal's employment need, (3) justification on how other sites in Shifnal were ruled out in the sustainability appraisal and (4) the heritage assessment used to inform their site selection process and (5) why SC has chosen to take on the overspill of employment and housing development required by the Black County.	Shropshire Council considers that a proportionate and robust evidence base has been prepared to inform the draft Shropshire Local Plan. Shropshire Council also considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Comments on the Sustainability Appraisal (SA) noted. Proposed changes to SA would have no material effect so are not considered necessary. Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0286	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Legal Compliance - Gunning Principles	No	No	No	Common Law imposes specific requirements on public consultation through R.V Brent LBC Ex p. Gunning {1985} 4 WLUK 200 which set four legal principles for consultations to be legal (known as the Gunning Principles). These are that (i) Plans must be at a formative stage before a final decision has been made or pre-determined by the decision maker. the Council have not published consultation responses following the Regulation 18 Plan prior to publishing the Regulation 19 Plan and no written responses have been prepared to permit the public and elected local representatives to consider the arguments for the Regulation 19 Plan. This is considered to imply that the proposals in the Regulation 18 Plan were not at a formative stage and the Regulation 19 Plan has already been pre-determined including the employment land allocations in Shifnal. The Council have not responded to inconsistencies in the recording of the hectarage of land for SHF018b and SHF018d suggesting the figures used to release Green Belt land are not based on sound evidence contrary to the Gunning principles. Council also advertised RAF Cosford and SHF018b/SHF018d as potential development sites outside of the Green Belt prior to the strategic sites consultation where the sites were proposed for release from the Green Belt suggesting the Council had predetermined their strategic sites which is re-enforced by the lack of response to objections and queries following the consultation. (ii) There is sufficient information to give 'intelligent consideration' to the information provided. A number of evidence documents are missing, incomplete or out of date including the Local Transport Plan, Annual Monitoring Report, Tree & Woodland Strategy, Health and Well Being Strategy expires in 2021, no formal Estate Plans have been published to support Policy SP15, the Tourism Economic Impact Report is 2013, Landscape Characterisation Assessment is 2006. Information on the website, such as the proposed Local Plan period and the Local Development Scheme have not been kept up-to-date. There has been a lack of clarity over the hectarage of the employment allocations and the densities for the housing allocations in Shifnal, double counting in the calculation of the land area to be made available on the employment allocations which impacts on the release of Green Belt land. Inaccuracies in the Sustainability Appraisals. Therefore, how can the public be expected to judge the soundness of policies and proposals in the Plan, when crucial parts of the evidence are unavailable for the public to view. This is especially important when these proposals are likely to impact on the need to release Green Belt land. As well as going to the soundness of the plan and compliance with Government guidance, the failure to make accessible to the public evidence relied on by the Council, is contrary to the legal requirement in the Gunning case to permit intelligent consideration of accurate information bringing the soundness of the plan into question. (iii) There is adequate time for consideration and response to provide sufficient opportunity for consultees to participate in the process. There has been insufficient time through the review process with Regulation 18 Pre-Submission consultation permitting only 8 weeks during the summer holiday period. The Regulation 19 consultation was conducted in a similar manner over the Christmas period and national lockdown (addressed through an extension of the period) with libraries closed preventing access to the consultation documents that included matters affecting the whole County, 35 new policies referring to 50 evidence documents with appendices and a large number of new evidence documents contributing to the 11,000 page evidence base. In contrast, the Preferred Scale & Distribution of Development and Issues & Options Consultations that avoided holiday periods or the Preferred Sites and Strategic Sites consultation for just 4 sites that covered longer periods of 9 and 10 weeks. The period allowed was also reduced by the fact that several pieces of evidence quoted in the Plan were not put on the evidence base website at the start of the consultation period and nearly half was not put on the evidence base at all (this included the Infrastructure and Implementation Plan, Economic Development Needs Assessment, Transport Plan and Estate Plans) contrary to the statement on the Councils website on this consultation. This also contrasts with consultations on other public documents including a 12 week consultation on the revised Statement of Community Involvement that is 27 pages; 8 weeks for the Community and Rural Strategy that is 22 pages; and 12 weeks for the Cultural Strategy that is 33 pages. It is considered that this inconsistency is further evidence that this consultation is flawed and legally questionable. (iv) 'Conscientious consideration' must be given to the consultation responses before a decision is made. It is considered that the Council have not published evidence showing how consultation responses have been taken into account. The publication of a summary of responses does not demonstrate how feedback has been considered and how it has been incorporated into the next review phase or why the Council took decisions contrary to recommendations in the consultation responses.
A0286	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Duty to Co-operate	No	No	No	The duty to cooperate is a legal requirement for council's and statutory bodies to work together on strategic cross-boundary issues. In SC's case the county is adjoined by several local authority areas, and there are areas beyond this with a functional relationship, most notably the Black Country. As previously set out, there is no information contained in SC's evidence base which demonstrates why SC are proposing to include 1,500 dwellings to meet the Black Country needs. Without this key information being made publicly available, we cannot ascertain whether or not the duty to cooperate, under the Localism Act and NPPF has been conducted in an appropriate manner.
A0286	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Statement of Community Involvement	No	No	No	The Statement of Community Involvement (SCI) has not been regularly reviewed as required by Government guidance. The Council has also failed to comply with their SCI. The Town Council and local community have previously submitted detailed comments on locally relevant issues at each consultation stage, but SC have failed to respond to those concerns showing how they have taken those views into account or why they have not accepted them. This does not constitute effective or meaningful dialogue as the community involvement has been one way.
A0286	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Statement of Common Ground	No	No	No	Paragraph 27 of the NPPF sets out that 'authorities should produce, maintain, and update one or more statement(s) of common ground, throughout the plan-making process'. It goes onto state that 'such statements should be made publicly available throughout the plan-making process to provide transparency'. One of the tests of soundness is that a Plan must be effective and that cross-boundary matters that have been addressed are to be evidenced by the statement of common ground. This has not been demonstrated by SC and the current review process is unsound. As set out above SC are proposing to include 1,500 dwellings to meet the Black Country needs and no statement of common ground was submitted to accompany this consultation. Without this statement, there was no information on identified needs as required by paragraph 012 (reference ID: 61_024012-20190315) of the Plan Making guidance, for the public to understand the reasoning for this change. The NPPF requires that such statements should be provided throughout the preparation of the plan and not at the end. As members of the public have not been consulted on this, the evidence base is clearly flawed.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0286	B002	See summary of main issues.	<p>Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p>	No
A0286	B003	See summary of main issues.	<p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No
A0286	B004	N/A	<p>Shropshire Council strongly considers that it has met the requirements of the Statement of Community Involvement. The consultation process undertaken is also considered to comply with the Gunning Principles and national legislation.</p>	No
A0286	B005	N/A	<p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0286	B006	Sustainability Appraisal	Sustainability Appraisal	No	No	No	Shropshire Council failed to satisfy Section 19 of the Planning and Compulsory Purchase Act 2004(PCPA), Regulation 5(1) and Regulation 12 and Schedule 3 of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) and the European Directive 2001/42/EC in Recital 17 to use the environmental report to inform the Plan and generally in “the assessment of the effects of certain plans and programmes on the environment”. The Council also failed in relation to the Strategic Environmental Assessment and Sustainability Appraisal guidance note Paragraphs 002 to undertake an iterative process and Para 018 to consider all reasonable alternative sites and the reasons for setting them aside. The preparation of the Pre-Submission Plan is therefore legally flawed and unsound. This failure is endorsed by Seaport Investments Ltd 2002 NIQB 62 that there must be parallel development of the environmental report and draft plan. In Berkeley v SoS Others 2002 3 WLR & Save Historic Newmarket Ltd v Forest Heath DC (2011 EWHC 606, and Royal Brompton & Harefield NHS Foundation Trust v Joint Committee of Primary Care Trusts (2011) EWHC 2986, there must be an environmental statement in a single accessible format prepared from the start of the process and presenting relevant environmental information with a non-technical summary to assist potential consultees. The Sustainability Appraisal fails to properly assess sites against all scoping objectives especially proximity to public transport (SO6 incorrectly recorded as quality of agricultural land), reduction of CO2 emissions (SO12) and adaptation and mitigation to climate change (SO13). The SA used to inform the site assessments failed to assess these key Scoping Objectives in the Pre-Submission Plan and Strategic Sites consultation rendering the process not legally compliant and producing site selection decisions that are inadequate, incorrect and unintelligible under the Gunning Principles. Site SHF018d was also not included in the SA and not assessed individually or against reasonable alternatives including SHF018a with a lower sustainability scoring. This indicates a pre-determination of the selected sites contrary to the Gunning Principles requiring consultation at a formative stage before final decisions are made. The SA on the Preferred Scale and Distribution (PSD) consultation stage was prepared on the basis Shifnal would receive 16ha of employment land and would minimise the need for additional car based transport. The Preferred Sites (PS) stage increased the amount of employment land for Shifnal to 40ha, but the SA failed to assess public transport criteria and to assess the SHF018d individually or against alternatives. The Council cannot show the increase in employment from 16 to 40ha and the allocation of Shif18d for employment use, would be sustainable development as these matters were not appraised at the appropriate time. The SLAA Report 2018 did not present a map with sites boundaries and these boundaries could only be ascertained through a web-site search without any cross referencing in the SLAA report. There was no map in the SA for the public to identify the location and boundaries of sites appraised. Case law states that a disparate collection of documents traceable only by a person with a good deal of energy and persistence does not satisfy legal requirements on making documents available to the public.
A0286	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	No	No	No	Policy SP2 requires, from 2016 to 2038, the provision of around 30,800 new dwellings at around 1,400 dwellings per annum. SC need to clarify the uplift of this housing target to 30,800 above the minimum 25,894 new dwellings required by central Government and above the demographic need of only 20,746 new dwellings. SC also need to explain why 1,500 dwellings for Black Country needs is also accommodated in the proposed housing provision despite their being no change to the standard methodology for most West Midlands local planning authorities except for Birmingham, Wolverhampton, Coventry and Stoke-on-Trent. The existing 'standard methodology for calculating housing requirements is based on the lower 2014-household projections (not the 2018 based projections) for both Shropshire and Telford & Wrekin which would permit SC to reduce their housing targets rather than increase them to 30,800 dwellings.
A0286	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	No	No	No	Policy SP2 requires, from 2016 to 2038, around 300 hectares of employment land at around 14ha of employment land per annum. Appendix 6 of the Employment Land Supply states that the strategic employment land supply will be 414ha and it is unclear how this figure contributes to the employment land requirement nor why the two figures are different. The 300ha requirement is considered sufficient to deliver enough jobs to achieve a sustainable balance with their housing requirement but SC need to explain how this balanced growth projection was calculated. The proposed 30,800 dwellings and 300 ha of employment land seem disproportionate and as an example, guideline employment land figure for Shifnal was previously 16 ha but increased to 41ha in the Pre-Submission Draft SLP. SC indicate the 1,500 new dwellings proposed at Shifnal should equal circa 1,500 new jobs. Each job needs on average 42.25 sq.m of finished floorspace equal to 40% of the entire employment site. This means, an additional 40% needs to be added to the overall total. The calculation is 1,500 new dwellings x 42.25 sq.m of floorspace x 40% equal to 15.84ha. For the figure to increase to 41ha, the 40% provided by SC appears to be already included in the balanced growth calculation of 16 ha.SC need to explain the methodology to calculate Shifnal’s employment need. The employment land supply figure identified by SC also fail to account for employment land proposed at RAF Cosford (Aviation Academy, 1500 additional military personnel; new air ambulance development). This additional land puts the actual employment land figure at +50% above the 300ha requirement and so, there is a clear over provision of employment land over the next plan period.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0286	B006	See summary of main issues.	The Council considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.	No
A0286	B007	The existing 'standard methodology for calculating housing requirements is based on the lower 2014-household projections (not the 2018 based projections) for both Shropshire and Telford & Wrekin which would permit SC to reduce their housing requirement from 30,800 dwellings.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0286	B008	The actual employment land available in the County +50% higher than the 300ha requirement and so, the employment land requirement may be reduced over the next plan period. The employment land guideline for Shifnal should also be reduced to 16ha.	In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038. Shropshire Council also consider that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0286	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	No	No	No	Paragraph 7 of the NPPF sets out that 'the purpose of the planning system is to contribute to the achievement of sustainable development'. The draft plan has not been proactively prepared in accordance with the three overarching objectives, which help form sustainable development. Significant weight is placed on the economic objective for Shifnal and the wider district but very little on the social and environmental objectives. The proposed inclusion of 41 ha of employment land and 1,500 new dwellings in Shifnal will lead to substantial losses of Safeguarded Land and Green Belt eroding the natural green space between Shifnal and Tong. Contrary to paragraph 9 of the NPPF, the local circumstances, needs and opportunities for Shifnal are not considered and the proposed urban extension will have a detrimental effect on the surrounding landscape, road infrastructure, schools and health services. The proposed Draft Plan is therefore unsound. There is no recognition in the Pre-Submission Draft SLP of the potential impacts of Covid-19 on the local economy, including increased homeworking reducing the need for employment land. A more conservative estimate of the employment land requirements should be undertaken, with reconsideration of the requirement waiting until the next plan review, reassessing the economic situation when the full effects of Covid-19 can be assessed. Otherwise, there is a high likelihood that employment will not keep up with the high housing figure proposed and so balanced growth will not occur nor will sustainable development be achieved in accordance with Policy SP4.
A0286	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	No	No	No	Policy SP6 sets out that new development should ensure the health and well-being of individuals, communities and places. The location of Shifnal's employment land to the north east and future strategic housing to the south and west is contrary to the Neighbourhood Plan and the views of the local community on the future development of their town. A large proportion of Shifnal's existing and new housing stock south and west is split from the proposed employment land to the north east. The existing central railway line makes access from the south and west to the new employment land only achievable through the centre of Shifnal via the Market Place, Victoria Road, Braford Street and Aston Street junctions on a road network too constrained to carry the proposed increased transport movements throughout the town. This is assessed in 'Comments on the Effect on Traffic in Shifnal Caused by the Proposed Employment Land Development (Land off Stanton Road)'. In addition, the infrastructure improvements including highways improvements required by the recent inclusion of 1,100 new dwellings have yet to be implemented in Shifnal and Shifnal does not have the infrastructure or facilities to accommodate 41 ha of employment land and a further 1,500 new dwellings, in addition to the 1,100 new dwellings being built out. The employment and housing allocations are disproportionate to the existing settlement, fail to maintain or enhance the vitality of Shifnal and have a harmful impact on the social wellbeing of the local community, risking the erosion of community cohesion. SC must assess the proposed cumulative growth in Shifnal over this relatively short time from 2012 – 2021 and through the 2038 which will have a negative impact on social wellbeing and social cohesion within Shifnal contrary to Policy SP6.
A0286	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	No	No	No	SC concluded that exceptional circumstances exist for the release of Green Belt land without properly satisfying NPPF paragraph 137 to demonstrate that all other reasonable development options for meeting identified needs have been properly assessed. This omission affects land released for housing and employment uses on sites allocated for development to 2038 and also land safeguarded for future development. The evidence base for the Local Plan did not provide the reasons why other sites were rejected and did not consider other opportunities for industrial development within neighbouring Telford and the sub-region (Staffordshire, Wolverhampton, West Midlands etc) before changing the Green Belt boundaries around Shifnal. Shifnal Town Council suggested SHF018a as a more sustainable option than SHF018b/SHF018d to meet the employment needs of the town and no explanation was provided for rejecting SHF018a as safeguarded land. The land that is safeguarded is not justified in the evidence base, Sustainability Appraisal or Proposals Map. There is also conflict in Policy S15.1 between Point 4 which seeks to promote the local and sub-regional role and functions of Shifnal and Point 7 which protects the safeguarded land from development except in very special circumstances. These very special circumstances relate more to the sub-regional role of the town than to the local objectives in the Neighbourhood Plan which is a material consideration for the Local Plan. This also reflects an objective in the exceptional circumstances statement that Shifnal should perform the same role as Bridgnorth even though Shifnal is a smaller settlement, located close to the strategic centre of Telford. Shifnal is also expected to be influenced by development of the strategic site on the former Ironbridge Power Station. The release of Green Belt land for development and safeguarding cannot be justified as all reasonable options for development have not been assessed and exceptional circumstances for the release of this Green Belt land have not been properly identified.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0286	B009	A more conservative estimate of the employment land requirements should be undertaken, with reconsideration of the requirement waiting until the next plan review, reassessing the economic situation when the full effects of Covid-19 can be assessed.	<p>The draft Shropshire Local Plan seeks to achieve the sustainable development of Shropshire. All references to sustainable development within the draft Shropshire Local Plan recognise the three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). This is recognised within the introduction to the draft Shropshire Local Plan, which states "the pursuit of sustainable development is at the heart of the planning process" and that "achieving sustainable development will mean that decision takers must look at all facets of sustainability in arriving at decisions: economic, social and environmental. In all cases a balance of considerations is needed, and it is accepted this will often lead to a variety of opinions being expressed."</p> <p>The proposals within the draft Shropshire Local Plan have been informed by a comprehensive Sustainability Appraisal process.</p> <p>Draft Policy SP4 is not seeking to define sustainable development, rather it is providing clarity on how the presumption in favour of sustainable development introduced within the NPPF would apply, if relevant, in Shropshire.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Comments on the Sustainability Appraisal (SA) noted. Proposed changes to SA would have no material effect so are not considered necessary.</p> <p>With regard to the proposed safeguarded land, it is noted that the National Planning Policy Framework (NPPF) states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development".</p>	No
A0286	B010	Council must assess the proposed cumulative growth in Shifnal over this relatively short time from 2012 – 2021 and through the 2038 which will have a negative impact on social wellbeing and social cohesion within Shifnal contrary to Policy SP6.	The Council considers that there is no conflict between Policy SP6 and its strategy for Shifnal. The latter forms part of the overall approach to development in Shropshire which is aimed at achieving all facets of sustainable development, social, economic and environmental.	No
A0286	B011	See summary of main issues.	<p>It is understood that this representation primarily relates to the proposed strategy for Shifnal and not the content of draft Policy SP11. Issues raised relating to Shifnal are addressed in the relevant settlement section.</p> <p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No

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A0286	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	No	No	No	Policy SP12 refers to the employment requirement to deliver around 300 ha of employment land throughout the plan period. The spatial strategy identified to achieve these objectives is also set out in Policy SP12. There is no explanation in this Policy nor in the description of the strategy to explain the reasons why proposed employment allocation SHF018d and SHF018b have been brought forward in Shifnal over other sites and SHF018a, in particular. This omission makes it difficult to establish whether the plan led approach is successful in protecting and improving areas of higher landscape value. In the evidence presented as part of SC's Highways Assessment, it is unclear why site 2- plots SHF018b & d are identified as having low or medium highways impact, whilst adjoining sites 1 and 3 are considered as having a high to very high highways impact. SC also need to clarify the methodology used for calculating Shifnal's balanced growth and resulting employment need.
A0286	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	No	No	No	Policy SP14 reiterates that development in the 'strategic corridors through the Green Belt or Shropshire Hills Area of Outstanding Natural Beauty will be subject to appropriate national and local policy. We consider that the proposed 41ha of employment land at Shifnal is at conflict with paragraph 137 of the NPPF, because exceptional circumstances to justify the Green Belt release in the area, has not been provided throughout the review process. The Pre-Submission Draft SLP refers to the role that Shifnal would play to provide strategic economic development in the M54 strategic corridor. The employment land proposed at RAF Cosford has not been included in the overall calculations to assess the need and it should be acknowledged that there is a plentiful supply of already committed employment land in neighbouring authorities in this corridor. It is an unsustainable assumption that Shifnal would attract such strategic employment development to justify the release of such large areas of Green Belt.
A0286	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	No	No	No	There is no justification for Policy SP15 to support the non-statutory plans of larger estate owners. The implementation of Policy SP15 would support the long-term vision and objectives of Bradford Estates to promote a new settlement at Tong providing support in principle for a development not currently proposed in the Local Plan housing requirement or housing supply projection. This would prejudice the ability of the public to comment on the specific development proposal and to influence the degree of future flexibility in permitting further development. This is despite the intention to have "meaningful public consultation" which could be open to wide interpretation depending on the point of view of the promoters or planning authority etc. Accordingly, there is a concern that Policy SP15 allows Bradford Estates to promote this scheme without any justification for the special privileges given to larger landowners in the County. SP15 prejudices the community against larger landowners which can be argued as being contrary to the Equality Act.
A0286	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17	No	No	No	The strategic housing and employment allocations in Shifnal do not conform with Policy DP17 because they are not properly assessed against other sites in the Sustainability Appraisal nor are reasons given for rejecting alternative sites contrary to Section 13 of the NPPF (Protecting Green Belt Land). The Sustainability Appraisal (pages 91 – 96) finds Sites SHF018b and P15b score poorly for overall sustainability and much of the proposed 'safeguarded land also gets lowish scores but are included in the proposed sites. The extension east of Upton Lane (SHF018d) is contrary to national policy, as no exceptional circumstances are provided for its release. SC do not correctly apply the findings of the Green Belt Review Assessment to SHF018d which constitutes an unacceptable encroachment into the countryside, with no recognisable, permanent boundary, causing High Harm to the Green Belt and extending east of Upton Lane which is a clearly defined Green Belt boundary. This indicates no exceptional circumstances for this land release given the availability of alternative sites causing Less Harm particularly SHF018a now proposed as safeguarded land. SC state the Green Belt land releases for employment use (SHF018b and SHF018d) are of Moderate to High Harm but land east of Upton Lane has a High Harm to the Green Belt and landscape. SHF018d is part of Broad Area 29 In the Green Belt Review containing the proposed MAAC site intended to be removed from the Green Belt further causing moderate to high harm with no justification for these Green Belt land releases.
A0286	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP21	No	No	No	Policy DP21 sets out that, "the safeguarding of people and property and mitigation of the effects of climate change, will be achieved by directing development to areas at least risk of flooding". SC's Strategic Flood Risk Assessment sets out that the majority of Shifnal is located within Flood Zone 1, with the area immediately around the Wesley Brook located within Flood Zones 2 and 3 (1 being low risk and 3 being high). This report has also identified that Shifnal has one of the highest surface water flood risks in the county and would be the most vulnerable to cumulative increases in flood risk due to new development. With most of this risk coming from Wesley Brook being a source to its confluence with River Worfe. In accordance with paragraph 157 of the NPPF it should be noted that the Sequential and Exception Test of Shifnal's proposed allocated sites in the Pre-Submission Draft Local Plan does not fully recognise Shifnal's identified surface water flood issues.
A0286	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23	No	No	No	To date no strategic plan has been presented to illustrate how the Development Strategy for Shifnal will ensure the historic character of the town will be preserved or enhanced after the towns proposed extension in accordance with the objectives of Policy SP23. Evidence for the strategic allocations advised that heritage assessments were produced to inform the site selection process but it remains unclear as to how the historic environment was considered in the evidence base or from the Sustainability Appraisal contrary to Paragraph 185 of the NPPF which would question the soundness of the Plan. The Landscape and Visual Sensitivity Assessment also confirms the majority of parcels have visual and landscape sensitivity issues for existing landscapes, listed buildings and conservation areas. The allocations will change the appearance of the historic character of Shifnal, there will be intensification of traffic flows through the centre of Shifnal which is a factor that Historic England regards as affecting historic towns with development of transport infrastructure also affecting historic landscapes and damaging heritage assets.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0286	B012	Policy SP12 refers to the employment requirement to deliver around 300 ha of employment land throughout the plan period. The spatial strategy identified to achieve these objectives is also set out in Policy SP12. There is no explanation in this Policy nor in the description of the strategy to explain the reasons why proposed employment allocation SHF018d and SHF018b have been brought forward in Shifnal over other sites and SHF018a, in particular. This omission makes it difficult to establish whether the plan led approach is successful in protecting and improving areas of higher landscape value. In the evidence presented as part of SC's Highways Assessment, it is unclear why site 2-plots SHF018b & d are identified as having low or medium highways impact, whilst adjoining sites 1 and 3 are considered as having a high to very high highways impact. SC also need to clarify the methodology used for calculating Shifnal's balanced growth and resulting employment need.	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. It is considered that an employment land provision at Junction 3 of the M54 Motorway is not required during this Plan period to 2038. The employment policies SP12, SP13 and SP14 would still be sufficiently flexible to accommodate such an outcome in the event that the circumstances determining the strategy for the Local Plan were to change considerably during the Plan period.	No
A0286	B013	See summary of main issues.	Shropshire Council has undertaken a robust and proportionate site assessment process to inform the identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt including land at Shifnal proposed to be allocated for employment development and land proposed to be safeguarded for consideration in future plans for the growth and development of the town. The draft Local Plan should seek to achieve sustainable development for those areas where a planned strategy is presented in the Local Plan including Shifnal. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered to be appropriate for the draft Local Plan to address the need for new employment to be generated in Shifnal within the planned strategy for the town.	No
A0286	B014	There is a strong objection to policy SP15 and its potential interpretation which may prejudice the future protection of the Green Belt and public participation on future development proposals and the Council must address the omission of the Estate Plans in the Local Plan evidence base by making them available on the public.	Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal. Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.	No
A0286	B015	See summary of main issues.	Policy DP17 requires development proposals to assess their impact on landscape and visual amenity and will apply to any planning applications on sites SHF018b, P15b and SHF018d. The principles behind policy DP17 have been applied through the Sustainability Appraisal and Site Assessment process which considered the landscape and visual sensitivity of all SHLAA sites based on the Council's Landscape and Visual Sensitivity Study.	No
A0286	B016	See summary of main issues.	The application of the Sequential and Exception Tests to all proposed site allocations is based on the information contained in the Council's Strategic Flood Risk Assessments (Levels 1 and 2) and follows national planning policy and guidance. As such the Council feels it is accurate and appropriate.	No
A0286	B017	The heritage assessments informing these decisions should be published to show the mitigation for the future conservation and preservation of heritage assets in Shifnal town centre.	Policy DP23 will ensure that heritage assets in Shifnal are safeguarded in response to development proposals. The Sustainability Appraisal and Site Assessment process considered heritage assets throughout and the results are available on the Council's website. No change proposed.	No



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A0286	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP25	No	No	No	Shifnal has limited investment in infrastructure (including roads and footpaths, new medical centre, education and leisure facilities) to support the expansion of the town despite the recent 1,100 new dwellings recently approved and currently being built out, resulting in some 40% increase in the town's population. The Pre-Submission Draft SLP paragraph 5.215 highlights that the future housing extension to south and west of the town which is safeguarded) will provide improvements at Five Ways and Innage Road. However, S106 funding has already been obtained from developers of recent large housing developments for improvements to Fiveways to meet the increased traffic needs of the town. Further to this, no practical infrastructure improvements have been identified to accommodate the proposed growth of the town.
A0286	B019	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Shifnal Town Strategy	No	No	No	Council need to present evidence to justify the release of Green Belt land for safeguarding for future development beyond 2038 to the east, south and west of Shifnal. This designation implies the principle of development on this land is accepted despite the community not being consulted on this prior to including the land the Plan. The safeguarding of this significant area of land will also place further strain on Shifnal should the County be unable to demonstrate an adequate housing land supply in the short to medium term. Council need to justify the reason for considering Green Belt policies in the event that an earlier development proposal was considered for the safeguarded land under very special circumstances and whether the development of the land would be afforded the same weight as Green Belt land. Council need to demonstrate the very special circumstances for the release of allocations SHF018b and SHF018d and show that this omission will not provide a precedent for the release of further safeguarded land in a future review of the Local Plan. Council also need to have regard to the conservation of the historic character of Shifnal and make available any submitted heritage assessments to illustrate the proposed mitigation of to conserve and enhance the historic character of the town. The Local plan also needs to recognise the underlying consensus of the local community set out in the objectives of the Shifnal Neighbourhood Plan that any development should retain the small market town character as a principle attraction of the town. Council should justify the large release of Green Belt land which are contrary to national policy including paragraph 006 of the Planning Policy Guidance and which undermine the Shifnal Neighbourhood Plan. it is recognised that the Neighbourhood Plan only goes to 2026, the principle issues brought forward by the community and underpinning the Plan, are still relevant and should be reflected in the Local Plan proposals. The proposals are clearly a significant departure from the Neighbourhood Plan and the community and Shifnal Town Council has understandably raised the question about whether their efforts to produce the Plan were worthwhile. If the proposals were to go ahead this would naturally cause a great deal of local resentment. Council take into account both Market Drayton and Broseley Neighbourhood Plans, while Shifnal's Plan has not been acknowledged. We would like to understand why this is the case.
A0286	B020	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 RAF Cosford	No	No	No	Policy S21 designates RAF Cosford as a strategic site to be removed from the Green Belt to complement and enable the growth aspirations in the east of the County. The potential employment and training provision on this strategic site are expected to facilitate the sustainable growth of the local economy and contribute to meeting the employment needs of nearby Albrighton. The strategic site consists of around 221ha of land, over half of which is previously developed land but the land within the site and the aspirations for future development are not included in the identified need for 300 ha of employment land over the next plan period. The Council therefore need to demonstrate the exceptional circumstances for this land release in the Green Belt contrary to paragraph 135 of the NPPF. Policy S21 will not prevent coalescence between settlements nor will it assist in safeguarding the countryside from encroachment instead future development will have fewer restrictions leading to future sprawl of different types of employment uses and requiring further Green Belt release. This has resulted in a contradiction in the Plan between RAF Cosford being removed from the Green Belt to meet the development aspirations of the military and museum and releasing the land as a Strategic Site for other major developments without the constraints of the Green Belt. Significant development to date at RAF Cosford and Cosford Museum have already been permitted and developed under existing planning policies CS5, MD6 without requiring uncontrolled Green Belt land releases. The lack of clarity for the proposed strategic allocation is at odds with paragraph 16 (f) of the NPPF and paragraph 4 point N of Policy S21 that requires 'opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt will be included as part of any new development proposals in accordance with Green Belt Policy SP11'.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0286	B018	The Council need to acknowledge the infrastructure needs of the community and their concerns at the infrastructure capacity of the town and where and when further infrastructure investment will be provided in advance of further developments in Shifnal.	The infrastructure needs of Shifnal will be taken into account through the Strategic Infrastructure Implementation Plan and Place Plan process.	No
A0286	B019	Council should not remove the proposed safeguarded land from the Green Belt and should instead demonstrate the very special circumstances for the release of land for further development. The Council should also publish any submitted heritage assessments to illustrate the proposed mitigation to conserve and enhance the historic character of the town should any land be released from the Green Belt for development.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. . Development guidelines for sites released for development will ensure the site design, layout and landscaping respects the character and significance of adjoining land uses. In the Green Belt, this is required to strengthen the boundary to the urban area to help maintain the openness and permanence of the Green Belt around Shifnal. On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038.	No
A0286	B020	Need to understand how SC intend to mitigate the resulting impacts caused from the proposed Green Belt release on the wider landscape. Surely the openness of Green Belt will not be retained, so we are not sure why para 4n has been included.	Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site. In identifying proposed site allocations a comprehensive site assessment process has been undertaken. The comprehensive site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. The site assessment process also included consideration of landscape/visual amenity and strategic issues such as the relationship to the existing built form. Indeed, the extent of the proposed strategic site has been informed by consideration of the need to maintain an appropriate gap between RAF Cosford and Albrighton. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Furthermore proposed site guidelines recognise the need to make compensatory improvements to the Green Belt, consistent with national policy, including through appropriate additional planting to improve visual amenity and biodiversity and creation of linkages to green infrastructure networks and corridors beyond the site.	No

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A0286	B021	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 Midlands Air Ambulance	No	No	No	Shifnal Town Council also note that the MAAC site is being promoted as part of the RAF Cosford Strategic Site and not as a one-off allocation for the MAAC. SC have no controls to ensure that the site is only developed for MAAC. Planning permission has now been granted as an exception for MAAC in the Green Belt, so this site no longer needs removing from the Green Belt or provided as a strategic allocation.
A0287	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0287	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0287	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0287	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0286	B021	The proposed site for the MAAC no longer needs removing from the Green Belt or provided as a strategic allocation.	Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site, including the aspirations of the Midland Air Ambulance Charity. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No
A0287	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0287	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0287	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0287	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0287	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0288	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0288	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0288	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from ‘inappropriate development’. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is ‘inappropriate development’, unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating ‘very special circumstances’. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0288	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0287	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0288	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0288	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0288	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0288	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0288	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0289	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005. Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside. Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village
A0290	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a) Policies Map 3	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0288	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0289	B001	The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented. Reference to Cressage being a Community Hub should be deleted as they are misleading. Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005. Plans for footpaths and traffic calming should be more specific. The A458 should be re-routed to bypass Cressage.	Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy. The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council. In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community. The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.	No
A0290	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0291	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0292	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0291	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0292	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0293	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0294	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0293	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0294	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0295	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0296	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	No	No	<p>There is a common law duty to take the results of consultation "conscientiously into account". Therefore there is a need to investigate why the level of development proposed exceeds that required and is incompatible with/breaches Government's legally binding commitment to tackle the climate emergency.</p>
A0296	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.26	No	No	No	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has been achieved, given consideration of how Covid 19 restrictions impact on the ability to have their say has not occurred.</p> <p>One stated means of viewing documents was local libraries, however these closed during consultation, meaning those without internet were unable to get involved (significant given Shropshire's demographics).</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0295	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0296	B001	<p>Investigate why the level of development proposed exceeds that required and is incompatible with/breaches Government's legally binding commitment to tackle the climate emergency.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers appropriate and effective consultation has been undertaken to inform the Local Plan Review and that all consultation responses have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No
A0296	B002	<p>Review the consultation process during Covid 19 and the impact this has had on responses.</p> <p>Also review analysis of responses.</p>	<p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0296	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	No	No	There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005. Shropshire Council have also made serious errors in calculations of totals, because they have classed identical responses as a single response (over 300 people replied using pre-filled forms), this is undemocratic and illegal as it silences voices.
A0296	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	Yes	No	No	There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where nearly 300 residents opposed Cressage Community Hub status and felt method for selection was incorrect (scoring of services, facilities and employment), unfair and unjust. No feedback or changes were made. Continue to feel the method by which Cressage was identified as a Community Hub is incorrect.
A0296	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	No	No	There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has been achieved, given consideration of how Covid 19 restrictions impact on the ability to have their say has not occurred. One stated means of viewing documents was local libraries, however these closed during consultation, meaning those without internet were unable to get involved (significant given Shropshire's demographics).



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0296	B003	Review Local Plan consultation process and disclose responses. Review Hierarchy of Settlements Assessment in relation to the scoring for Cressage and if points are reduced, remove Community Hub status from Cressage.	<p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan. Summaries of the responses to each of these stages of consultation have been prepared. These are available on the Shropshire Council website and form Appendices to the Consultation Statement.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>When considering consultation responses, each individuals response is considered on its own merits, irrespective of whether it is the same as another respondents. Reference to unique respondents is clarification that multiple responses from an individual are considered as a single response (although all elements of this response are considered), rather than several responses.</p>	No
A0296	B004	Review Local Plan consultation process and disclose responses. Review Hierarchy of Settlements Assessment in relation to the scoring for Cressage and if points are reduced, remove Community Hub status from Cressage.	<p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan. Summaries of the responses to each of these stages of consultation have been prepared. These are available on the Shropshire Council website and form Appendices to the Consultation Statement.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council also considers that the development strategy proposed for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p>	No
A0296	B005	Review the consultation process during Covid 19 and the impact this has had on responses. Also review analysis of responses.	<p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0296	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	No	No	The Draft Shropshire Local Plan: -Includes growth (housing and employment) beyond demographic need that is too high, which is not sustainable as it is at odds with the climate and ecological emergencies and based on questionable figures. -Will not deliver appropriate types of houses in the right locations. -Has been subject to flawed and undemocratic consultation.
A0296	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	No	No	The Regulation 18 Preferred Sites Consultation stated Cressage was a proposed Community Hub. However the Regulation 19 draft Shropshire Local Plan states it has been a Community Hubs since 2015, this is inaccurate, erroneous and misleading. As such the draft Shropshire Local Plan is not legally binding because of misinformation/error.
A0296	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.27	Yes	No	No	Responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub and considered the scoring system that resulted in this proposed status, have been ignored. Do not consider the Parish Council have considered/reflected community views.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0296	B006	<p>Explain why level of growth exceeds demographic need and is too high.</p> <p>Assess whether the Local Plan will get the right sort of houses in the right locations.</p> <p>Review the consultation process.</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan. The proposed employment land requirement also incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan.</p> <p>It is also considered that the draft policies within the draft Shropshire Local Plan would implement this proposed strategy and contribute to delivering the right types of houses in the right locations.</p> <p>Shropshire Council also considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p>	No
A0296	B007	<p>Review Local Plan consultation process.</p> <p>Review errors/misinformation in the draft Shropshire Local Plan relating to Cressage.</p>	<p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p>	No
A0296	B008	<p>Review Local Plan consultation process and disclose responses.</p> <p>Review Hierarchy of Settlements Assessment in relation to the scoring for Cressage and if points are reduced, remove Community Hub status from Cressage.</p>	<p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan. Summaries of the responses to each of these stages of consultation have been prepared. These are available on the Shropshire Council website and form Appendices to the Consultation Statement.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council also considers that the development strategy proposed for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0297	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.47	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0297	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0298	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0299	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.1	No	No	No	<p>With regard to proposals for Much Wenlock:</p> <ul style="list-style-type: none"> <li>-A complete lack of consultation has occurred with local people, the local council and other local organisations. Consultation is limited to landowners/developers.</li> <li>-The current Much Wenlock Neighbourhood Plan (MWNP) has been ignored and proposals contradict it.</li> <li>-Much Wenlock has a long history of flooding, as it is sited in a 'bowl'. Flooding still occurs despite two recent flood mitigation schemes (attenuation ponds).</li> <li>-Proposed allocation MUW012VAR is adjacent to the Hunters Gate estate, which is regularly subject to serious flooding. Future development must include a pre-condition that this is resolved, however there is minimal local trust that development proposals will successfully drain the development site and the Hunters Gate estate.</li> <li>-Additional developed areas plus existing flood problems within the town must be fully assessed (including consideration of climate change). No substantial development should occur until this occurs.</li> <li>-Sufficient capacity must be available within the sewage treatment works.</li> <li>-There is severe congestion at the junctions of the A458 and A4169 (Gaskell Arms), this leads to congestion on surrounding roads as people seek to bypass it. Development of 1,000 dwellings on the Former Ironbridge Power Station and the 200 dwellings proposed for Much Wenlock will exacerbate this issue. This issue must be addressed, A by-pass is required for the settlement.</li> <li>-Much Wenlock is already becoming a commuter/retirement location. Do not consider sufficient employment opportunities can be provided for the residents of the proposed 200 dwellings for Much Wenlock and commuting will therefore increase.</li> <li>-A small number of dwellings should be provided to meet the needs of local young people.</li> </ul>
A0300	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0298	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0299	B001	Completely revise the document after full and proper consultation.	<p>Noted. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement.</p> <p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p>	No
A0300	B001	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0300	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0300	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0300	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0300	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0300	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0300	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0301	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0302	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0301	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0302	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0303	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0303	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0304	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.48	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0304	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0305	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	Yes	<p>The Local Plan does not comply with the law, national policy or national guidance on Plan Making and Sustainability and so it is not legally compliant and not sound in accordance with supporting technical and legal evidence submitted with this representation. The Plan fails to accord with the tests of soundness in NPPF para 35 as follows:</p> <p>Not Positively Prepared - proposals are not supported by objective assessments ensuring housing and employment allocations may withstand objective challenges and SA appraisals are inconsistent. Unmet need from the Black Country is not substantiated by any evidence and the quantum of overspill development is not justified. The Plan strategy is based principally on economic objectives with limited consideration of social and environmental objectives and inadequate consideration of infrastructure needs.</p> <p>Not Justified - evidence has not been published and so cannot be shown to be proportionate and a consideration of reasonable alternatives to the proposed sites has not been presented in consultations.</p> <p>Not Effective - the high housing growth and anticipated employment development is not shown to be deliverable especially given lower historical delivery rates and the effects of the Covid-19 pandemic.</p> <p>Not consistent with national policy - does not comply with NPPF or Plan Making guidance and Sustainability Appraisal Notes particularly in failing to consider alternative proposals, give evidenced responses to consultation representations and failing to justify Green Belt releases through exceptional circumstances.</p> <p>Whilst statements should be succinct, the extent of non-compliance with the law, policy and guidance, the failure to respond to objections raised in previous consultations and with no further submissions being permitted, it is essential that a fully detailed case be put to the Inspector. This includes objections referenced to supporting legislation and case law, planning policy, and Government Plan Making and Sustainable Appraisal guidance. It also includes objections supported with detailed technical reasons, the failure of the Council to respond contrary to the law, the NPPF, Government guidance and the Council's own Statement of Community Involvement. With the detailed supporting evidence in Appendix 1, the Inspector may properly assess legal, procedural and soundness issues.</p>
A0305	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	Yes	<p>The Local Plan consultation processes do not comply with the law, national policy or national guidance on Plan Making and Sustainability and so it is not legally compliant and not sound in accordance with supporting technical and legal evidence submitted with this representation.</p> <p>The consultation processes fail to comply with the Gunning Principles for consultations to (1) publicise proposals at the 'formative' stage, (2) provide sufficient information for 'intelligent' consideration, (3) permit sufficient time to consider and respond and (4) to give 'conscientious' consideration to responses before reaching a decision.</p> <p>The Local Plan consultations fail to comply with the Council's Statement of Community involvement. In particular, they have not complied with the community involvement processes and have not shown how the views expressed by the public have been incorporated into the Plan nor how consultation responses have influenced the preparation of the Plan.</p> <p>The Council have failed to submit a Statement of Common Ground with either the Draft Reg 18 Pre-Submission Plan when a Black Country Housing Overspill was proposed, nor with the current Reg 19 Pre Submissions Plan when a further Black Country Employment Overspill was proposed. This is contrary to the requirements of NPPF paragraph 27 and Planning Guidance on Plan Making in paragraphs 009 and 020.</p>
A0305	B003	Sustainability Appraisal	Sustainability Appraisal	No	No	Yes	<p>Previous consultations failed to comply with the law and policy guidance on sustainability appraisals and hence also failed to comply with the law on the Plan complying with sustainable development requirements. Appraisal scoring did not include all the criteria stated to be assessed and the Plan allocated an employment site in Shifnal that had not been appraised at all. No reasons were given as to why more sustainable alternatives were rejected as required by the law. Information related to the SAs especially identification of site references to actual locations was not cross referenced or (provided) in one easily accessible location as required by case law (see attached statement for a detailed analysis of the law and its non-compliance here)</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0305	B001	See summary of main issues.	<p>Shropshire Council considers a proportionate and robust evidence base has been prepared to inform the Local Plan Review. Specifically with regard to the proposed housing and employment land requirements, this includes such evidence as a Viability Study, Local Housing Need Assessment, Strategic Housing Market Assessment, Five Year Housing Land Supply Statement, Place Plans and Strategic Infrastructure Implementation Plan, Economic Development Needs Assessment and Employment Land Review.</p> <p>Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>The Council also considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.</p>	No
A0305	B002	See summary of main issues.	<p>Shropshire Council considers a proportionate and robust evidence base has been prepared to inform the Local Plan Review. Specifically with regard to the proposed housing and employment land requirements, this includes such evidence as a Viability Study, Local Housing Need Assessment, Strategic Housing Market Assessment, Five Year Housing Land Supply Statement, Place Plans and Strategic Infrastructure Implementation Plan, Economic Development Needs Assessment and Employment Land Review.</p> <p>Proposals within the draft Shropshire Local Plan have been subject to and informed by a proportionate and robust Sustainability Appraisal.</p> <p>Shropshire Council also considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the Gunning Principles. All consultation responses have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No
A0305	B003	See summary of main issues.	The Council considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0305	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 - Housing	No	No	Yes	There is no sound evidence to justify the high growth housing requirement of 30,800 dwellings which is significantly higher than the housing needs of the County. The housing requirement will be difficult to justify: whether this can be delivered as sustainable development, whether past experience will be repeated through a significant need for greenfield and Green Belt land releases. The impact of Covid-19 is evidence for a cautious approach to development based on delivering housing need alone with subsequent reviews of the Local Plan providing the opportunity to assess the impacts of Covid-19 and to adjust the scale of development in the County. There is also no justification for the Black Country Housing Overspill to support tis need in Shropshire. The use of land in Shropshire to meet this suggested unmet need also fails to take account of Government policy to promote the use of brownfield land to meet the need in the Black Country.
A0305	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 - Employment	No	No	Yes	There needs to be a consistent employment figure in the different sections of the Plan where Policy SP2 refers to 300ha, the allocation total in Settlement Policies is 376ha and Appendix 6 refers to a total of 414ha. The SP2 requirement for 300ha was intended to meet the County's own needs and to balance the provision of housing but has now been reduced by also comprising the 30ha of unmet need in the Black Country. The Black Country Plan and supporting evidence is also at an early stage so there is no justified evidence to support the need for any employment overspill to be allocated in Shropshire. As the employment requirement has an impact on the release of greenfield and Green Belt land particularly through meeting Black Country needs in Shropshire, a clear and consistent employment figure is essential for the Plan to be found sound and to show that the proposals meet the sustainable development requirements of national policy.
A0305	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	No	No	Yes	The sections of this policy that permits unrestricted economic development outside settlements are superfluous and give 'carte blanche' approval to economic development outside established settlement areas, undermining the protected status of Green Belt and Safeguarded Land and the stated reasons for allowing removal of Green Belt in the Plan. The policy as worded gives no certainty or assurance to the public on the type of development expected for their area and makes the proposals contrary to policy and unsound. Proposed revised wording for economic development policy will enable development to take place but requires a higher degree of justification, grants more opportunity to the public to give their input before any such decision is taken unlike the proposed policy wording in the Plan.
A0305	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	No	No	Yes	The sections of this policy that permits unrestricted economic development outside settlements are superfluous and give 'carte blanche' approval to economic development outside established settlement areas, undermining the protected status of Green Belt and Safeguarded Land and the stated reasons for allowing removal of Green Belt in the Plan. The policy as worded gives no certainty or assurance to the public on the type of development expected for their area and makes the proposals contrary to policy and unsound. Proposed revised wording for economic development policy will enable development to take place but requires a higher degree of justification, grants more opportunity to the public to give their input before any such decision is taken unlike the proposed policy wording in the Plan.
A0305	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	No	No	Yes	The sections of this policy that permits unrestricted economic development outside settlements are superfluous and give 'carte blanche' approval to economic development outside established settlement areas, undermining the protected status of Green Belt and Safeguarded Land and the stated reasons for allowing removal of Green Belt in the Plan. The policy as worded gives no certainty or assurance to the public on the type of development expected for their area and makes the proposals contrary to policy and unsound. Proposed revised wording for economic development policy will enable development to take place but requires a higher degree of justification, grants more opportunity to the public to give their input before any such decision is taken unlike the proposed policy wording in the Plan.
A0305	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	No	No	Yes	Local Plan Appendix 3 states 'Key' evidence supporting this policy are final or draft Estate Plans and the Sustainability Appraisal but no such estate plans are included in the Plan evidence base to justify Policy SP15 and on 20 <sup>th</sup> January, a Planning Officer confirmed "no estate plans have been prepared and agreed". There is also no Sustainability Appraisal to support Policy SP15 as there are no sites proposed for development in this policy and with no supporting evidence the policy is unsound. Where proposals were to be made by an Estate they could be considered as and when they arise under the other policies of the Plan. Policy SP15, in approving a "long term vision objectives" which may not be development specific, could provide future flexibility that prejudices the public's ability to comment on development proposals and imply consent 'in principle' for estates development. There are many objections to proposal by Bradford Estates for a Garden Village in the Green Belt at Junction 3 of the M54. This is not part of the Local Plan, but SP15 would permit this proposal to be submitted for planning approval to override Green Belt policy and the public's involvement in major development proposals. Policy SP15 favours a small section of the community i.e. large landowners at the behest of all other landowners in the County – and is unfair, unequal and contrary to equality legislation.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0305	B004	The total requirement figure for Shropshire should be 25,000 dwellings to reflect housing need and the 1,500 dwellings proposed for the Black Country overspill should be deleted.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0305	B005	The total requirement figure for Shropshire should be 25,000 dwellings to reflect housing need and the 1,500 dwellings proposed for the Black Country overspill should be deleted. The employment land requirement should also be reduced.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0305	B006	Delete this policy to allowing development outside settlements on greenfield and Green Belt land and delete the inclusion of RAF Cosford as a Strategic Site. Replace this policy with a general economic policy stating that any windfall/significant development that cannot be accommodated within a settlement would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land.	Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt including land at Shifnal proposed to be allocated for employment development and land proposed to be safeguarded for consideration in future plans for the growth and development of the town.	No
A0305	B007	Delete this policy to allowing development outside settlements on greenfield and Green Belt land and delete the inclusion of RAF Cosford as a Strategic Site. Replace this policy with a general economic policy stating that any windfall/significant development that cannot be accommodated within a settlement would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land.	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local Plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic.	No
A0305	B008	Delete this policy to allowing development outside settlements on greenfield and Green Belt land and delete the inclusion of RAF Cosford as a Strategic Site. Replace this policy with a general economic policy stating that any windfall/significant development that cannot be accommodated within a settlement would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land.	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local Plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic.	No
A0305	B009	Policy SP15 should be deleted form the Plan.	Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal. Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0305	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15 Shifnal	No	No	Yes	NPPF paragraph 70 states that whenever an allowance is made for windfall development as part of anticipated supply, compelling evidence is needed that windfall sites will provide a reliable source of supply. The Council have failed to provide any evidence, let alone compelling evidence to justify such a high proportion of windfall allowance and so their proposal is not sound and contrary to national policy. Having regard to the potential windfall sites in Shifnal, the percentage of windfall allocations in other settlements and the potential for pressure to release Safeguarded Land/Green Belt in the future to meet unmet windfall allowance, the existing figure of 92 dwellings is excessive.
A0305	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15 Shifnal - SHF015/SHF029	No	No	Yes	The Plan does not indicate size or proposed densities of allocated housing sites as these figures vary for some housing sites between this Plan, previous consultation Plans and other evidence documents like the Green Infrastructure Plan. As allocated housing sites will determine the amount of land released from the Green Belt or protected as Safeguarded Land, the Plan should present accurate figures to be considered sound for the reasons given in Appendix 1. If the windfall allowance is adjusted downwards to 48 dwellings there would be a residual requirement for 274 dwellings from a total residual requirement of 322 dwellings. Allocated site SHF013 is stated to be 3.87ha on the SLAA Assessment and could provide up to 111 dwellings at a prescribed density of 28.57dws/ha. In the absence of any justified density calculations, Government policy seeks the most efficient use of land up to 30dws/ha providing for up to 116dws on site SHF013. Sites SHF022 comprises 1.74ha in the SLAA and SHF023 comprises 13.99ha of which 10.4ha are already safeguarded and 3.59ha is allocated with a capacity for up to 152 dwellings as 28.57dws/ha or 160dws at 30dws/ha. Therefore sites SHF013 and SHF022/SHF023 have a combined capacity for up to 276dws and there is no need to allocate sites SHF015/SHF029 for housing development in Shifnal and this land may remain as safeguarded for future development.
A0305	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15 Shifnal - employment	No	No	Yes	The reasons given for the huge increase on the originally proposed 16ha do not stand up to scrutiny as the net built floorspace argument was already built into the total County employment requirement and so is double counting when applied here. Similarly the size of buildings reason is no different to that proposed for other settlements where no such increase has been proposed. The subsequent increase to between 39-41ha (there is inconsistency in this Plan and previous consultations on exact figures) is not based on evidence to justify the release of so much land from the Green Belt. Past decisions of the Council on releasing employment land for housing, the Council's own Employment Land Review (which is part of the evidence base), allowing 1100 houses in the town without requiring any employment land and past history of employment take up rate, plus the current doubts on the future of economic development resulting from the impact of Covid-19 are detailed evidence to support the originally proposed figure of 16ha.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0305	B010	Amend the windfall allowance for Shifnal from 92 dwellings (28%) of the residual housing requirement of 322 dwellings to 48 dwellings (15%) of the residual requirement.	The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021 subject to the delivery of the modest windfall allowance for the town. At current rates of development in Shifnal (at 200 dwellings/year) the windfall allowance represents a supply of housing land equal to only a 6 month period. The windfall allowance will allow for smaller developers to enter the market and for development to be delivered that may target the local market and so, it is considered important to sustain this windfall allowance in the draft Local plan.	No
A0305	B011	Amend the windfall allowance for Shifnal downwards from 92 dwellings (28%) to 48 dwellings (15%) from the residual housing requirement of 322 dwellings for Shifnal. Delete the housing allocation on Sites SHF015/SHF029 and leave the sites as safeguarded land for future development in the period after 2038. Allocate the residual housing requirement of 274 dwellings for Shifnal up to 2038 on the remaining sites SHF013 and SHF022/SHF023.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings including sites SHF015 & SHF029 that will make an important contribution to meeting the housing needs of Shifnal and helping to conserve the important historical building of Beech House and its curtilage structures and land. These allocation complement the existing committed supply of 370 dwellings which further complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021 and which will deliver the 1,500 housing guideline figure for Shifnal. The delivery of the housing guideline figure is subject to the delivery of the modest windfall allowance for the town. At current rates of development in Shifnal (at 200 dwellings/year) the windfall allowance of 92 dwellings represents a supply of housing land equal to only a 6 month period. The windfall allowance will allow for smaller developers to enter the market and for development to be delivered that may target the local market and so, it is considered important to sustain this windfall allowance in the draft Local Plan.	No
A0305	B012	Revise the employment guideline figure downwards from 41ha to 16ha (with 14ha of new sites) as originally proposed in the Preferred Scale and Distribution of Development consultation in October 2017.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development in the period to 2038 in order to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. Whilst Shropshire Council has proposed to support the Black Country Authorities to meet their unmet needs in Shropshire, it is not proposed to identify specific sites to accommodate the intended contribution to cross-boundary needs arising within the Black Country (1,500 dwellings and 30ha of employment land). Rather this is included within the proposed housing and employment land requirements subject to the proposed strategic approach for the level and distribution of development across Shropshire.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0305	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15 Shifnal - SHF018a/P14a and SHF018b/SHF018d	No	No	Yes	Safeguarded sites SHF018a/P14 are more sustainable sites in the SLAA assessment than the allocated employment sites SHF018b/SHF018d. Sites SHF018a/P14 also have a lower negative sustainability score in the Sustainability Appraisal and would cause less harm if released from the Green Belt. No evidence has been submitted to justify the reasons why sites SHF018a/P14 were not considered appropriate for allocation as the preferred employment sites even though they were 'reasonable alternative' sites. It is considered that the requirement for 'exceptional circumstances' for releasing sites SHF018b/SHF018d from the Green Belt has not been met. In particular, site SHF018d has not been subject to a Sustainability Approval as required by law and policy despite having a high degree of harm to the Green Belt as shown in the evidence base and leading to the incorrect statement in the Plan that the combined effect of releasing sites SHF018b/SHF018d has a Moderate-High harm. This is contrary to NPPF Green Belt policy, the law and policy on sustainable development and sustainability appraisal and the legal requirement to consider reasonable alternatives and to give reasons why those alternatives were not selected.
A0305	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15 Shifnal - SHF017/P16	No	No	Yes	The justification for removing the SHF017 and P16 (Lodge Hill) from the Green Belt does not stand up to scrutiny as evidenced in detail in the attached Appendix 1 statement and these safeguarded sites should not be released from the Green Belt. It is noteworthy that the Council failed to respond to any of the detailed objections to these two sites or to rebut the objections in any way. The fact the Council have allocated SHF017 and P16 as Safeguarded Land and specified the types of development to be constructed on the land is not consistent with NPPF Green Belt policy and is not consistent with the manner in which land proposed to be released from the Green Belt has been designated in other settlements in the Local Plan. The failure to also consider reasonable alternative sites that may also be released from the Green Belt is also contrary to law. The alternative proposals in Shifnal are in more sustainable locations and their release from the Green Belt would have less harm, especially as they would not lead to a significant reduction in the narrow area of Green Belt separating Shifnal from Telford as with the release of land at Lodge Hill, proposed in the Local Plan. In preference, it is suggested that additional land be safeguarded to the east of Shifnal on existing safeguarded sites SHF015/SHF029 and through the release of sites P15a and P15b from the Green Belt. If it was considered that additional Safeguarded Land is required to provide choice and flexibility in the future, then site SHF032/SHF018c(part) would be more sustainable being closer to schools, employment area and town centre car park than the sites at Lodge Hill which are proposed in the Local Plan.
A0305	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 RAF Cosford	No	No	Yes	RAF Cosford should remain in the Green Belt as accepted by the Inspector on the previous Local Plan. Green Belt and SAMDev policies have not prevented nor delayed major development at the military base and Museum. There are no exceptional circumstances for releasing Green Belt land since the development proposals in the Plan could similarly be approved within existing policies despite the reasoning in the Plan that such development could not occur in the Green Belt. The release of RAF Cosford from the Green Belt is therefore not sound. The Strategic Site designation contradicts the exceptional circumstances given for removing the site from the Green Belt. The Strategic Site designation could encourage unplanned economic development at RAF Cosford not related to its military/museum functions. If the land is removed from the Green Belt, RAF Cosford should not be allocated as a Strategic Site but proposed solely for its military / museum functions.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0305	B013	Allocate sites SHF018a/P14 as the preferred employment sites in Shifnal for the period to 2038 and remove the safeguarding designation from these two sites. Remove the employment allocations from sites SHF018b/SHF018d and instead safeguard site SHF018b for future development for the period after 2038 and continue to protect site SHF018d as land within the Green Belt and do not allocate or safeguard this land for development.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings including sites SHF015 & SHF029 that will make an important contribution to meeting the housing needs of Shifnal and helping to conserve the important historical building of Beech House and its curtilage structures and land. These allocation complement the existing committed supply of 370 dwellings which further complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021 and which will deliver the 1,500 housing guideline figure for Shifnal. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. . Development guidelines for sites released for development will ensure the site design, layout and landscaping respects the character and significance of adjoining land uses. In the Green Belt, this is required to strengthen the boundary to the urban area to help maintain the openness and permanence of the Green Belt around Shifnal.	No
A0305	B014	Delete the safeguarding designation from sites SHF017pt/P16 (land between Park Lane and A4169) and SHF017pt (land between A4169 and railway line) and do not release these sites from the Green Belt. Instead replace the safeguarding provision for future development in Shifnal after 2038 on existing safeguarded sites SHF015/SHF029 and safeguard site P15a Upton Lane/Lamledge Lane (part of which is Sub Opportunity Area Sh-1a in the Green Belt Review Assessment) and site P15b (north-west Upton Lane), part of Sub Opportunity Area Sh-1a (north-west of Windmill/East A464) after releasing these sites from the Green Belt for future development. If it is considered that additional Safeguarded Land required to provide choice and flexibility in the future, then release sites SHF032/SHF018c (in part) from the Green Belt and safeguard the land as these sites are more sustainable than Lodge Hill proposals being closer to schools, employment areas and the town centre car park.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038.	No
A0305	B015	Do not remove RAF Cosford from the Green Belt and do not designate the site as a Strategic Site. The site should remain in the Green Belt.	Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0305	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 RAF Cosford	No	No	Yes	The proposed site for the new Midlands Air Ambulance ground base has now been granted planning permission for the stated use as an exceptional circumstance in the Green Belt. There are, therefore, no longer any exceptional circumstances to justify its removal from the Green Belt or indeed to require any allocation of the site. The proposal to also allocate the site as a Strategic Site would encourage non-air ambulance development on the site in future undermining the stated reasons for removing the site from the Green Belt, contrary to NPPF Green Belt policy, which is not sound.
A0306	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0306	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0306	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0306	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0305	B016	Delete the site allocation for the relocation and expansion of the Midlands Air Ambulance ground base.	Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site, including the aspirations of the Midland Air Ambulance Charity. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No
A0306	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0306	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0306	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0306	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0306	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0307	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13. MUW012VAR	No	Not Specified	Not Specified	The Much Wenlock Neighbourhood Plan (MWNP) sets out clear objectives to focus development on small scale sites, in character with existing housing and meeting local needs (priority for affordable homes and homes for the elderly). The Draft Shropshire Local Plan ignores these objectives by proposing an allocation for 120 dwellings (MUW012VAR). As such claims the draft Shropshire Local Plan meets the objectives of the MWNP are rhetoric and it is contrary to local democracy and the Localism Act 2011. MUW012VAR is prone to surface water flooding which can develop very quickly (Much Wenlock is a Flood Rapid Response Catchment in the highest category and MUW012VAR is identified as an area at particular risk to life and property within an Environment Agency Briefing Note). Why allocate this site when others, that are not similarly effected, are available? As such, MUW012VAR is contrary to the draft Shropshire Local Plan, which identifies surface water flood risk as a very significant local consideration. Also consider proposals to delegate responsibility for the flood defences of MUW012VAR to the developer is contrary to the draft Shropshire Local Plan. Responsibility for the flood defences of the adjacent Hunters Gate estate were also the developers and it experiences severe flooding, do not want history repeating itself. Shropshire Council has ignored legal duties toward the National Flood Risk Strategy and Flood and Water Act 2020, by failing to identify and address flooding issues to the Hunters Gate estate.
A0307	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13. MUW012VAR	Not Specified	No	Not Specified	The draft Shropshire Local Plan is unsound in many critical areas, including: -The proposed housing requirement exceeds need, but no justification for this is provided. This results in over-development. -New housing and employment proposals for Much Wenlock supposedly respond to 'local needs', but the levels proposed exceed local need and disregard the principles of the Much Wenlock Neighbourhood Plan (MWNP). -The proposed residential guideline for Much Wenlock increased from 150 to 200 dwellings without any community consultation. Understand this is to make proposed allocation MUW012VAR viable (capacity of the site increased from 80 to 120 dwellings), this demonstrates the residential guideline is developer led rather than need led and unsound in relation to MUW012VAR. -Proposals ignore local views in Much Wenlock as set out in the MWNP. -Do not consider a single site for 120 dwellings is sustainable in Much Wenlock. -Proposed allocation MUW012VAR and the site selection process undertaken to identify it is unsustainable, inconsistent with wider draft Shropshire Local Plan policies and unsound as: it is located within flood zone with no evidence of how flood risk is to be assessed/mitigated without exacerbating issues elsewhere (contrary to draft Shropshire Local Plan policies); reliance is placed on the developer to resolve flood risk, about which there is little confidence based on previous experience; it is beyond the development boundary on best and most versatile (Grade 3a - see MAFF ALC survey map ALCW00299) agricultural land contrary to the National Planning Policy Framework (NPPF); the indicative capacity of 176 dwellings is concerning given capacity has already increased for viability reasons; it contradicts conclusions of two previous enquiries; there is recognition of the need to upgrade infrastructure for Much Wenlock which is overstretched (schools, medical practice, water supply, drainage, sewage, traffic congestion on narrow roads), but little evidence of how this can be achieved to support MUW012VAR (contrary to Para 5 of draft Policy SP2); and it will damage the historic town and its unique landscape. -The existing employment allocation has not been delivered and Telford is a more attractive option. As such Much Wenlock will become a dormitory for larger conurbations, increasing commuting, congestion and associated pollution/carbon emissions, contrary to climate change policies in the draft Shropshire Local Plan. -The impact of the 1,000 dwellings proposed at the Former Ironbridge Power Station site (within the Much Wenlock Place Plan Area) is not recognised in draft Policy S13. This would have a huge impact on Much Wenlock (services and roads network, particularly Gaskell corner which is already a congestion hot-spot that leads to congestion on the wider network as people seek to avoid it).

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0306	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0307	B001	Embrace the principles of the Localism Act (2011) and the Much Wenlock Neighbourhood Plan (MWNP) by removing proposed allocation MUW012VAR and including smaller sites outside flood zones.	Noted. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement. Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.	No
A0307	B002	Remove proposed allocation MUW012VAR and instead include smaller brownfield sites outside flood zones, which meet actual local needs (affordable homes and homes for the elderly) in accordance with the Much Wenlock Neighbourhood Plan (MWNP).	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement. Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0308	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0309	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0309	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0308	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0309	B001	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0309	B002	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0309	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0309	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0309	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0310	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0310	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0309	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0309	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0309	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0310	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0310	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0310	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0310	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0310	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0311	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0311	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0310	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0310	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0310	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0311	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0311	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0311	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0311	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0311	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0311	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0311	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0311	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0312	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	Yes	<p>The Local Plan does not comply with the law, national policy or national guidance on Plan Making and Sustainability and so it is not legally compliant and not sound in accordance with supporting technical and legal evidence submitted with this representation. The Plan fails to accord with the tests of soundness in NPPF para 35 as follows:</p> <p>Not Positively Prepared - proposals are not supported by objective assessments ensuring housing and employment allocations may withstand objective challenges and SA appraisals are inconsistent. Unmet need from the Black Country is not substantiated by any evidence and the quantum of overspill development is not justified. The Plan strategy is based principally on economic objectives with limited consideration of social and environmental objectives and inadequate consideration of infrastructure needs.</p> <p>Not Justified - evidence has not been published and so cannot be shown to be proportionate and a consideration of reasonable alternatives to the proposed sites has not been presented in consultations.</p> <p>Not Effective - the high housing growth and anticipated employment development is not shown to be deliverable especially given lower historical delivery rates and the effects of the Covid-19 pandemic.</p> <p>Not consistent with national policy - does not comply with NPPF or Plan Making guidance and Sustainability Appraisal Notes particularly in failing to consider alternative proposals, give evidenced responses to consultation representations and failing to justify Green Belt releases through exceptional circumstances.</p> <p>Whilst statements should be succinct, the extent of non-compliance with the law, policy and guidance, the failure to respond to objections raised in previous consultations and with no further submissions being permitted, it is essential that a fully detailed case be put to the Inspector. This includes objections referenced to supporting legislation and case law, planning policy, and Government Plan Making and Sustainable Appraisal guidance. It also includes objections supported with detailed technical reasons, the failure of the Council to respond contrary to the law, the NPPF, Government guidance and the Council's own Statement of Community Involvement. With the detailed supporting evidence in Appendix 1, the Inspector may properly assess legal, procedural and soundness issues.</p>
A0312	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	Yes	<p>The Local Plan consultation processes do not comply with the law, national policy or national guidance on Plan Making and Sustainability and so it is not legally compliant and not sound in accordance with supporting technical and legal evidence submitted with this representation.</p> <p>The consultation processes fail to comply with the Gunning Principles for consultations to (1) publicise proposals at the 'formative' stage, (2) provide sufficient information for 'intelligent' consideration, (3) permit sufficient time to consider and respond and (4) to give 'conscientious' consideration to responses before reaching a decision.</p> <p>The Local Plan consultations fail to comply with the Council's Statement of Community involvement. In particular, they have not complied with the community involvement processes and have not shown how the views expressed by the public have been incorporated into the Plan nor how consultation responses have influenced the preparation of the Plan.</p> <p>The Council have failed to submit a Statement of Common Ground with either the Draft Reg 18 Pre-Submission Plan when a Black Country Housing Overspill was proposed, nor with the current Reg 19 Pre Submissions Plan when a further Black Country Employment Overspill was proposed. This is contrary to the requirements of NPPF paragraph 27 and Planning Guidance on Plan Making in paragraphs 009 and 020.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0312	B001	N/A	<p>Shropshire Council considers a proportionate and robust evidence base has been prepared to inform the Local Plan Review. Specifically with regard to the proposed housing and employment land requirements, this includes such evidence as a Viability Study, Local Housing Need Assessment, Strategic Housing Market Assessment, Five Year Housing Land Supply Statement, Place Plans and Strategic Infrastructure Implementation Plan, Economic Development Needs Assessment and Employment Land Review.</p> <p>Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>The Council also considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.</p>	No
A0312	B002	N/A	<p>Shropshire Council considers a proportionate and robust evidence base has been prepared to inform the Local Plan Review. Specifically with regard to the proposed housing and employment land requirements, this includes such evidence as a Viability Study, Local Housing Need Assessment, Strategic Housing Market Assessment, Five Year Housing Land Supply Statement, Place Plans and Strategic Infrastructure Implementation Plan, Economic Development Needs Assessment and Employment Land Review.</p> <p>Proposals within the draft Shropshire Local Plan have been subject to and informed by a proportionate and robust Sustainability Appraisal.</p> <p>Shropshire Council also considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the Gunning Principles. All consultation responses have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0312	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Legal Compliance - Gunning Principles	No	No	Yes	<p>Common Law imposes specific requirements on public consultation through R.V Brent LBC Ex p. Gunning {1985} 4 WLUK 200 which set four legal principles for consultations to be legal (known as the Gunning Principles). These are that (i) Plans must be at a formative stage before a final decision has been made or pre-determined by the decision maker. Evidence implies pre-determination of some proposals have occurred such as employment allocations at Shifnal and RAF Cosford Strategic Ste as both were advertised as potential economic development sites in the Council's Invest in Shropshire brochure/website before the Preferred Sites/Strategic Sites consultations where they were first proposed. Further the Council has failed to respond to objections to subsequent consultations.</p> <p>(ii) There is sufficient information to give 'intelligent consideration' to the information provided. A number of crucial evidence documents referenced or justifying draft policies are missing and as such the public cannot expect to judge soundness, including the Local Transport Plan/Strategy, Public Health Strategy, Annual Monitoring Report, West Midlands Design Charter, Tree &amp; Woodland Strategy, Black Country Evidence, Police Secured by Design, Health and Well Being Strategy, Retail Study, Community Led Plans, Estate Plans, Tourism Economic Impact Report, Landscape Characterisation Assessment, Village And Town Plans, Ecological Data Network, Environmental Network and Guidance. Information on the website, such as the proposed Local Plan period and the Local Development Scheme have not been kept up-to-date. There has also been a lack of clarity over the hectareage of the employment allocations and the densities for the housing allocations in Shifnal, double counting in the calculation of the land area to be made available on the employment allocations which impacts on the release of Green Belt land. Inaccuracies in the Sustainability Appraisals. Therefore, how can the public be expected to judge the soundness of policies and proposals in the Plan, when crucial parts of the evidence are unavailable for the public to view. This is especially important when these proposals are likely to impact on the need to release Green Belt land. As well as going to the soundness of the plan and compliance with Government guidance, the failure to make accessible to the public evidence relied on by the Council, is contrary to the legal requirement in the Gunning case to permit intelligent consideration of accurate information bringing the soundness of the plan into question.</p> <p>(iii) There is adequate time for consideration and response to provide sufficient opportunity for consultees to participate in the process. There has been insufficient time through the review process with Regulation 18 Pre-Submission consultation permitting only 8 weeks during the summer holiday period. The Regulation 19 consultation was conducted in a similar manner over the Christmas period and national lockdown (addressed through an extension of the period) with libraries closed preventing access to the consultation documents that included matters affecting the whole County, 35 new policies referring to 50 evidence documents with appendices and a large number of new evidence documents contributing to the 11,000 page evidence base. In contrast, the Preferred Scale &amp; Distribution of Development and Issues &amp; Options Consultations that avoided holiday periods or the Preferred Sites and Strategic Sites consultation for just 4 sites that covered longer periods of 9 and 10 weeks. The period allowed was also reduced by the fact that several pieces of evidence quoted in the Plan were not put on the evidence base website at the start of the consultation period and nearly half was not put on the evidence base at all (this included the Infrastructure and Implementation Plan, Economic Development Needs Assessment, Transport Plan and Estate Plans) contrary to the statement on the Councils website on this consultation. This also contrasts with consultations on other public documents including a 12 week consultation on the revised Statement of Community Involvement that is 27 pages; 8 weeks for the Community and Rural Strategy that is 22 pages; and 12 weeks for the Cultural Strategy that is 33 pages. It is considered that this inconsistency is further evidence that this consultation is flawed and legally questionable. (iv) 'Conscientious consideration' must be given to the consultation responses before a decision is made. It is considered that the Council have not published evidence showing how consultation responses have been taken into account. The publication of a summary of responses does not demonstrate how feedback has been considered and how it has been incorporated into the next review phase or why the Council took decisions contrary to recommendations in the consultation responses.</p>
A0312	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Statement of Community Involvement	No	No	Yes	<p>The Statement of Community Involvement (SCI) has not been regularly reviewed as required by Government guidance.</p> <p>The Council has also failed to comply with their SCI. The Town Council and local community have previously submitted detailed comments on locally relevant issues at each consultation stage, but SC have failed to respond to those concerns showing how they have taken those views into account or why they have not accepted them. This does not constitute effective or meaningful dialogue as the community involvement has been one way.</p>
A0312	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Statement of Common Ground	No	No	Yes	<p>Paragraph 27 of the NPPF sets out that 'authorities should produce, maintain, and update one or more statement(s) of common ground, throughout the plan-making process'. It goes onto state that 'such statements should be made publicly available throughout the plan-making process to provide transparency'. One of the tests of soundness is that a Plan must be effective and that cross-boundary matters that have been addressed are to be evidenced by the statement of common ground. This has not been demonstrated by SC and the current review process is unsound. As set out above SC are proposing to include 1,500 dwellings to meet the Black Country needs and no statement of common ground was submitted to accompany this consultation. Without this statement, there was no information on identified needs as required by paragraph 012 of the Plan Making guidance, for the public to understand the reasoning for this change. The NPPF requires that such statements should be provided throughout the preparation of the plan and not at the end. As members of the public have not been consulted on this, the evidence base is clearly flawed.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0312	B003	See summary of main issues.	<p>Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p>	No
A0312	B004	N/A	Shropshire Council strongly considers that it has met the requirements of the Statement of Community Involvement. The consultation process undertaken is also considered to comply with the Gunning Principles and national legislation.	No
A0312	B005	N/A	Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0312	B006	Sustainability Appraisal	Sustainability Appraisal	No	No	Yes	<p>Previous consultations failed to comply with the law and policy guidance on sustainability appraisals and hence also failed to comply with the law on the Plan complying with sustainable development requirements. Appraisal scoring did not include all the criteria stated to be assessed and the Plan allocated an employment site in Shifnal that had not been appraised at all. No reasons were given as to why more sustainable alternatives were rejected as required by the law. Information related to the SAs especially identification of site references to actual locations was not cross referenced or (provided) in one easily accessible location as required by case law (see attached statement for a detailed analysis of the law and its non-compliance here)</p> <p>Shropshire Council failed to satisfy Section 19 of the Planning and Compulsory Purchase Act 2004(PCPA), Regulation 5(1) and Regulation 12 and Schedule 3 of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) and the European Directive 2001/42/EC in Recital 17 to use the environmental report to inform the Plan and generally in “the assessment of the effects of certain plans and programmes on the environment”. The Council also failed in relation to the Strategic Environmental Assessment and Sustainability Appraisal guidance note Paragraphs 002 to undertake an iterative process and Para 018 to consider all reasonable alternative sites and the reasons for setting them aside. The preparation of the Pre-Submission Plan is therefore legally flawed and unsound. This failure is endorsed by Seaport Investments Ltd 2002 NIQB 62 that there must be parallel development of the environmental report and draft plan. In Berkeley v SoS Others 2002 3 WLR &amp; Save Historic Newmarket Ltd v Forest Heath DC (2011 EWHC 606, and Royal Brompton &amp; Harefield NHS Foundation Trust v Joint Committee of Primary Care Trusts (2011) EWHC 2986, there must be an environmental statement in a single accessible format prepared from the start of the process and presenting relevant environmental information with a non-technical summary to assist potential consultees. The Sustainability Appraisal fails to properly assess sites against all scoping objectives especially proximity to public transport (SO6 incorrectly recorded as quality of agricultural land), reduction of CO2 emissions (SO12) and adaptation and mitigation to climate change (SO13). The SA used to inform the site assessments failed to assess these key Scoping Objectives in the Pre-Submission Plan and Strategic Sites consultation rendering the process not legally compliant and producing site selection decisions that are inadequate, incorrect and unintelligible under the Gunning Principles. Site SHF018d was also not included in the SA and not assessed individually or against reasonable alternatives including SHF018a with a lower sustainability scoring. This indicates a pre-determination of the selected sites contrary to the Gunning Principles requiring consultation at a formative stage before final decisions are made. The SA on the Preferred Scale and Distribution (PSD) consultation stage was prepared on the basis Shifnal would receive 16ha of employment land and would minimise the need for additional car based transport. The Preferred Sites (PS) stage increased the amount of employment land for Shifnal to 40ha, but the SA failed to assess public transport criteria and to assess the SHF018d individually or against alternatives. The Council cannot show the increase in employment from 16 to 40ha and the allocation of Shif18d for employment use, would be sustainable development as these matters were not appraised at the appropriate time. The SLAA Report 2018 did not present a map with sites boundaries and these boundaries could only be ascertained through a web-site search without any cross referencing in the SLAA report. There was no map in the SA for the public to identify the location and boundaries of sites appraised. Case law states that a disparate collection of documents traceable only by a person with a good deal of energy and persistence does not satisfy legal requirements on making documents available to the public.</p>
A0312	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 - Housing	No	No	Yes	<p>There is no sound evidence to justify the high growth housing requirement of 30,800 dwellings which is significantly higher than the housing needs of the County, which is contrary to several strategic objectives requiring sustainable development/communities and difficult to justify as sustainable development. Also no evidence this will increase provision of affordable housing, how infrastructure will be provided at appropriate timescales (pre-requisite before growth - Moderate growth is more likely to achieve this), or how employment development to meet housing growth will be provided (given past take-up and implications of Covid).</p> <p>This requirement will increase strain on the ability to maintain a five year housing land supply, increasing pressure on unallocated land/safeguarded land which has implications on ability to meet future requirements (Shifnal already experienced problems from 40% increase in size of the town).</p> <p>The impact of Covid-19 is unclear and evidence for a cautious approach to development based on delivering housing need alone (reducing pressure on greenfield and Green Belt land releases and ensuring infrastructure provision can keep up) with subsequent reviews of the Local Plan providing the opportunity to assess the impacts of Covid-19 and to adjust the scale of development in the County.</p> <p>There is also no justification to provide for 1,500 dwellings towards suggested unmet need arising in the Black Country, which will exacerbate above issues. Para 35a of the National Planning Policy Framework (NPPF) states to be sound unmet need from neighbouring areas should only be accommodated where it is practical and consistent with achieving sustainable development, no evidence is provided of whether this is the case, how the figure was arrived at and whether it can be accommodated and meet sustainable community objectives so is unsound. No evidence that the Black Country have fully assessed availability of land to meet their own needs. The use of land in Shropshire to meet suggested unmet need also fails to take account of Government policy to promote the use of brownfield land to meet the need in the Black Country. The Green Belt Exceptional Circumstances Statement prepared to inform the draft Shropshire Local Plan states Shifnal will play a role in meeting this need, this is contrary to Green Belt policy as it is not to meet essential Shifnal needs and alternative locations are not considered so proposals are unsound. Further, the Council recognise Shifnal has infrastructure deficiencies to meet approved housing and is a commuter town. Adding unmet need from the Black Country would constitute unsustainable development/community so is unsound and contrary to legal requirements (proposals should be subject to Sustainability Appraisal).</p> <p>Telford is the largest settlement in east Shropshire and its population is below that planned when it was designated a new town. If there is a proven unmet need arising in the Black Country to be met west of the West Midlands, Telford would be a far better location than Shifnal to meet this need.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0312	B006	N/A	The Council considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.	No
A0312	B007	The total requirement figure for Shropshire should be 25,000 dwellings to reflect housing need and the 1,500 dwellings proposed for the Black Country overspill should be deleted.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0312	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 - Employment	No	No	Yes	<p>Consistent employment figure required, draft Policy SP2 refers to 300ha, the allocation total in Settlement Policies is 376ha and Appendix 6 refers to a total of 414ha (nearly a 40% difference). No reasoning is given for these wide variations or how various commitments in Appendix 6 contribute to achieving the proposed employment land requirement. The subsequent disaggregation to settlements therefore cannot be justified. RAF Cosford is also not taken into account (further discrepancy).</p> <p>The proposed employment land requirement now includes 30ha towards unmet need in the Black Country. The Black Country Plan and supporting evidence is also at an early stage so there is no justified evidence to support the need for any employment overspill to be allocated in Shropshire.</p> <p>The 300ha employment land requirement was intended to meet the County's own needs and to balance the provision of housing but has now been reduced by also comprising the 30ha of unmet need from the Black Country and has not been increased to reflect changes to the proposed Plan period (as per housing), this questions the justification for the employment land requirement.</p> <p>The employment land requirement has an impact on release of greenfield and Green Belt land particularly through meeting Black Country needs in Shropshire. A clear and consistent employment figure is essential for the Plan to be found sound and to show that the proposals meet the sustainable development requirements of national policy. The Economic Growth Strategy is a key piece of evidence, however it will be out of date before the draft Shropshire Local Plan is adopted and fails to consider the long term economic situation to 2038. As such it is considered unsound to rely on it.</p> <p>There is no recognition of the huge impact of Covid 19 on the economy and implementation of Policy, supporting a more realistic/conservative employment land and housing requirement to ensure balance/sustainable development. Undeveloped allocated employment land may come under pressure for housing adversely affecting sustainability. Subsequent reviews of the Local Plan providing the opportunity to assess the impacts of Covid-19 and to adjust the scale of development in the County. This failure makes the draft Shropshire Local Plan unsound.</p>
A0312	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	No	No	Yes	<p>The sections of this policy that permits unrestricted economic development outside settlements are superfluous and give 'carte blanche' approval to economic development outside established settlement areas, undermining the protected status of Green Belt and Safeguarded Land and the stated reasons for allowing removal of Green Belt in the Plan. The policy as worded gives no certainty or assurance to the public on the type of development expected for their area and makes the proposals contrary to policy and unsound. Proposed revised wording for economic development policy will enable development to take place but requires a higher degree of justification, grants more opportunity to the public to give their input before any such decision is taken unlike the proposed policy wording in the Plan.</p>
A0312	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	No	No	Yes	<p>The sections of this policy that permits unrestricted economic development outside settlements are superfluous and give 'carte blanche' approval to economic development outside established settlement areas, undermining the protected status of Green Belt and Safeguarded Land and the stated reasons for allowing removal of Green Belt in the Plan. The policy as worded gives no certainty or assurance to the public on the type of development expected for their area and makes the proposals contrary to policy and unsound. Proposed revised wording for economic development policy will enable development to take place but requires a higher degree of justification, grants more opportunity to the public to give their input before any such decision is taken unlike the proposed policy wording in the Plan.</p>
A0312	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	No	No	Yes	<p>The sections of this policy that permits unrestricted economic development outside settlements are superfluous and give 'carte blanche' approval to economic development outside established settlement areas, undermining the protected status of Green Belt and Safeguarded Land and the stated reasons for allowing removal of Green Belt in the Plan. The policy as worded gives no certainty or assurance to the public on the type of development expected for their area and makes the proposals contrary to policy and unsound. Proposed revised wording for economic development policy will enable development to take place but requires a higher degree of justification, grants more opportunity to the public to give their input before any such decision is taken unlike the proposed policy wording in the Plan.</p>
A0312	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	No	No	Yes	<p>Local Plan Appendix 3 states 'Key' evidence supporting this policy are final or draft Estate Plans and the Sustainability Appraisal but no such estate plans are included in the Plan evidence base to justify Policy SP15 and on 20<sup>th</sup> January, a Planning Officer confirmed "no estate plans have been prepared and agreed". There is also no Sustainability Appraisal to support Policy SP15 as there are no sites proposed for development in this policy and with no supporting evidence the policy is unsound. Where proposals were to be made by an Estate they could be considered as and when they arise under the other policies of the Plan. Policy SP15, in approving a "long term vision objectives" which may not be development specific, could provide future flexibility that prejudices the public's ability to comment on development proposals and imply consent 'in principle' for estates development. There are many objections to proposal by Bradford Estates for a Garden Village in the Green Belt at Junction 3 of the M54. This is not part of the Local Plan, but SP15 would permit this proposal to be submitted for planning approval to override Green Belt policy and the public's involvement in major development proposals. Policy SP15 favours a small section of the community i.e. large landowners at the behest of all other landowners in the County – and is unfair, unequal and contrary to equality legislation.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0312	B008	The total requirement figure for Shropshire should be 25,000 dwellings to reflect housing need and the 1,500 dwellings proposed for the Black Country overspill should be deleted. The employment land requirement should also be reduced.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0312	B009	Delete this policy to allowing development outside settlements on greenfield and Green Belt land and delete the inclusion of RAF Cosford as a Strategic Site. Replace this policy with a general economic policy stating that any windfall/significant development that cannot be accommodated within a settlement would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land.	Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt including land at Shifnal proposed to be allocated for employment development and land proposed to be safeguarded for consideration in future plans for the growth and development of the town.	No
A0312	B010	Delete this policy to allowing development outside settlements on greenfield and Green Belt land and delete the inclusion of RAF Cosford as a Strategic Site. Replace this policy with a general economic policy stating that any windfall/significant development that cannot be accommodated within a settlement would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land.	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local Plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic.	No
A0312	B011	Delete this policy to allowing development outside settlements on greenfield and Green Belt land and delete the inclusion of RAF Cosford as a Strategic Site. Replace this policy with a general economic policy stating that any windfall/significant development that cannot be accommodated within a settlement would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land.	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local Plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic.	No
A0312	B012	Policy SP15 should be deleted form the Plan.	Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal. Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0312	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15 Shifnal	No	No	Yes	<p>Proposals for Shifnal are contrary to draft Policy DP25 and unsound as defined in the National Planning Policy Framework (NPPF). The community are very concerned about existing infrastructure deficiencies following recent large housing development approvals (resulting in 40% population increase). Infrastructure has not had, but requires urgent investment to support existing approvals before further development is permitted (improvements to support further development should also occur before it is permitted). Consider the draft Shropshire Local Plan fails to adequately consider infrastructure requirements and deliverability of proposals.</p> <p>Proposals (role of the town, amount of employment, new neighbourhood to the south west and meeting non-local (unmet cross boundary) needs) also fail to reflect the character, need and opportunities of Shifnal as required by para 9 of the NPPF.</p> <p>Views of the local community and the content of the Neighbourhood Plan which forms part of the adopted Development Plan (no recognition of this document despite the incomplete plan for Market Drayton informing proposals there) have not been taken into account, as required by para 15 and 16c of the NPPF. Proposals for Shifnal should be amended to closely align with the objectives of the Neighbourhood Plan.</p> <p>NPPF requires consideration of all reasonable alternatives and demonstration of exceptional circumstances to justify any changes to Green Belt boundaries. Proposals for Shifnal are inconsistent and contradictory in its justification and as such contrary to national policy.</p> <p>Residential windfall allowance for Shifnal (92 dwellings constituting 30% of the additional housing proposed) is excessive, unsustainable and unjustified - there is limited potential to accommodate it within the proposed development boundary and as such it is contrary to para 70 of the National Planning Policy Framework (NPPF). Greater certainty about meeting the proposed housing guideline should be provided.</p> <p>Size/density of proposed allocations is unclear and inconsistent between different documents. Based on past densities (Preferred Sites consultation), SLAA site areas and NPPF requirement to make efficient use of land, the three proposed allocations could accommodate majority/more than the proposed net guideline (SHR013 and SHF022/pt023 could accommodate all needed housing), reducing the amount of land needed to be allocated, reducing/removing the windfall allowance and reducing the need for Green Belt release (the amount of allocated land for housing impacts on Green Belt release). It is essential that the size of allocated sites and density of housing proposed is clear, appropriate and unambiguous, but this is not the case. Failure to provide this information is contrary to case law and inconsistent with national policy.</p> <p>Given need to assimilate existing housing development, proposed allocations should be phased to post 2026 (raised during previous consultations). Current approach is inconsistent with community opinion (Statement of Community Involvement and Gunning Principles, Place Plan data, draft Policy SP7).</p> <p>There are inconsistencies in the employment land supply/guideline/capacity of proposed allocations within the document and other associated documents (examples provided in representation) which is not explained/justified. Further changes from that in past consultations have not been justified. Given land is proposed to be removed from the Green Belt it is important this is clear and precise so minimum Green Belt is lost. Public comments on previous consultations have referred to these inconsistencies but not been corrected so failing Gunning Principles and soundness.</p> <p>Consider the proposed employment land guideline is not justified and unsound. Original proposals were for 16ha but this increased to 40ha and then 41ha (significant increase to Green Belt loss (160%)). No reason for this can be supported by the evidence. Shropshire Council indicates local circumstances:</p> <ol style="list-style-type: none"> <li>1. that employment floorspace represents 40% of total site size, yet this applies to all of Shropshire (as per para 5.212) but uplift is inconsistently only applied in Shifnal and the 40% consideration is already applied to the total employment land requirement/guideline for Shifnal (as documented within the Preferred Scale and Distribution of Development Consultation), so is double counted.</li> <li>2. Commercial buildings are singly storey. However the type of employment proposed is similar to other sites and no justification is given why Shifnal is treated differently.</li> </ol>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0312	B013	<p>Align the strategy for Shifnal with the objectives of the Neighbourhood Plan.</p> <p>Ensure existing infrastructure deficits are addressed and infrastructure required to support new development is delivered before permitting further development.</p> <p>Amend the windfall allowance for Shifnal from 92 dwellings (28%) of the residual housing requirement of 322 dwellings to 48 dwellings (15%) of the residual requirement.</p> <p>Delete the housing allocation on Sites SHF015/SHF029 and leave the sites as safeguarded land for future development in the period after 2038. Allocate the residual housing requirement of 274 dwellings for Shifnal up to 2038 on the remaining sites SHF013 and SHF022/SHF023.</p> <p>Revise the employment guideline figure downwards from 41ha to 16ha (with 14ha of new sites) as originally proposed in the Preferred Scale and Distribution of Development consultation in October 2017, or lower.</p> <p>Remove/reduce/safeguard proposed employment land allocations.</p>	<p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The purpose of a Local Plan is to set the strategy and development requirements for any subsequent Neighbourhood Plans and as such, it is not possible to align the draft Local Plan to the currently approved Neighbourhood Plan for Shifnal. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings including sites SHF015 &amp; SHF029 that will make an important contribution to meeting the housing needs of Shifnal and helping to conserve the important historical building of Beech House and its curtilage structures and land. These allocations complement the existing committed supply of 370 dwellings which will further complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021 subject to the delivery of the modest windfall allowance for the town. At current rates of development in Shifnal (at 200 dwellings/year) the windfall allowance represents a supply of housing land equal to only a 6 month period. The windfall allowance will allow for smaller developers to enter the market and for development to be delivered that may target the local market and so, it is considered important to sustain this windfall allowance in the draft Local Plan. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. Whilst Shropshire Council has proposed to support the Black Country Authorities to meet their unmet needs in Shropshire, it is not proposed to identify specific sites to accommodate the intended contribution to cross-boundary needs arising within the Black Country (1,500 dwellings and 30ha of employment land). Rather this is included within the proposed housing and employment land requirements subject to the proposed strategic approach for the level and distribution of development across Shropshire.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0312	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15 Shifnal - SHF018a/P14a and SHF018b/SHF018d	No	No	Yes	<p>Consider proposed allocations SHF018b/SHF018d are contrary to NPPF Green Belt policy, the law, Gunning Principles and policy on sustainable development and sustainability appraisal and the legal requirement to consider reasonable alternatives and to give reasons why those alternatives were not selected and the need to justify exceptional circumstances (as required for Green Belt release). As such they are not considered sound.</p> <p>-It is illogical to allocate land for development whilst leaving undeveloped land between it and the town boundary (SHF018a/P14).</p> <p>-SHF018a/P14, benefit from a functional relationship with the adjacent Industrial Estate - lacking for SHF018b/SHF018d yet referenced in draft site guidelines.</p> <p>-SHF018a/P14 would lead to less harm to the Green Belt than SHR018b/SHF018d (SHF18b/SHF018d would represent encroachment into the countryside and beyond Lamledge Lane. SHF018d also lacks defined boundaries, as recognised within the Green Belt Review, contrary to para 139(f) of the NPPF. Para 5.211 of the draft Shropshire Local Plan incorrectly references the harm of proposed employment allocations and medium-high when it will be high).</p> <p>-Site SHF018d has not been subject to a Sustainability Approval as required by law and policy despite having a high degree of harm to the Green Belt as shown in the evidence base.</p> <p>-Safeguarded sites SHF018a/P14 are more sustainable sites in the SLAA assessment than the allocated employment sites SHF018b/SHF018d.</p> <p>-Sites SHF018a/P14 have a lower negative sustainability score in the Sustainability Appraisal.</p> <p>-Sites SHF018a/P14 have a similar site areas to SHF018b and would meet the original requirement for 14ha of additional employment land (without the unjustified further 24ha).</p> <p>-Past consultation documents stated the Council recognised the important contribution the promoters of SHF018b/SHF018d will make to the future of Shifnal through expeditious delivery, yet no evidence of this is provided. This also suggests pre-determination of the allocation. As does the inclusion of the site in the Invest In Shropshire Brochure.</p> <p>No evidence has been submitted to justify why sites SHF018a/P14 were not considered appropriate for allocation as the preferred employment sites, even though they were 'reasonable alternative' sites. SHF018b could then be safeguarded (if needed) and SHF018d remain in the Green Belt.</p> <p>Draft site guidelines for SHF018b/SHF018d include significant improvements to Stanton Road and no traffic to go west into Shifnal. However, no evidence of improvements, costs or how they will be undertaken (including restrictions to traffic to the west). As such proposals are unsound (must be effective and deliverable).</p> <p>It appears the increase to the employment land guideline proposed for Shifnal is simply to accommodate SHF016b/SHF018d, rather than to meet the needs of the town.</p>
A0312	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15 Shifnal: Safeguarded Land	No	No	Yes	<p>Safeguarded land proposals are contrary to the Gunning Principles, case law, national Green Belt policy (demonstrating consideration of reasonable alternatives and exceptional circumstances) and are unsound: -There are no parcel references for proposed safeguarded land, this means it is not possible for the public to relate parcels to accompanying documents and the Sustainability Appraisal (SA), this is legally flawed. -There are disparities in the size of parcels proposed to be released from the Green Belt.</p> <p>-The amount of safeguarded land is considered excessive and unjustified - it exceeds previous proposals and that needed for choice and flexibility to meet long term needs. As such there are no required exceptional circumstances and proposals are contrary to national policy and unsound. -There are better sites available for safeguarding (and SHF018/P14 are better for allocation than proposed allocations). SHF015/029 is not required to meet the stated housing guideline so could be safeguarded as could land north of Upton Lane (below the skyline). These would not impact on the narrow and critical gap to Telford, have a lower harm to the Green Belt and would be more logical and sustainable (including access to schools and employment). -Objections raised in previous consultations have not been responded to, including those about deliverability meaning proposals are not effective or consistent with national policy. -Extent of sites to south-west is claimed to be required to meet highway issues, suggesting pre-determination through discussions with site promoters prior to consultation. -</p> <p>Decision to in effect allocate safeguarded land for specific uses is contrary to para 139d of the NPPF and unsound. This is also inconsistent, without explanation, to the approach for other settlements. -The site to the south-west (described as a new neighbourhood community) would be self-contained, splitting the community and losing the towns character and feel (contrary to the Neighbourhood Plan). Lack of clarity about what is proposed in the draft Shropshire Local Plan. -Consider the principal reason for proposals are strategic objectives (role of the town on the M54 corridor), rather than meeting the town's needs. This is contrary to the Neighbourhood Plan and an unrealistic and inappropriate objective for the town (given size and nature, presence of Green Belt, proximity to Telford etc, would just result in housing without corresponding development) and not supported by the community. -Council suggests the need for a progressive and steady rate of growth to permit necessary infrastructure improvements, however there is no guarantee of this, likely to have just housing as per recent experiences. -Significant adverse affect on the Green Belt (reduced gap to Telford, loss of open countryside and encroachment) and it is not considered exceptional circumstances have been demonstrated to justify this high harm. -Land between A464 and M54 not pursued as it would close the gap to Telford, but the same applies to the land proposed between A4169 and the railway.</p> <p>With regard to proposed exceptional circumstances for land south-west of the town:</p> <p>-Provision of a new strategic highway between the A464 and A4169: not been subject to public consultation, informed by detailed proposals; contrary to expressed public opinion during the Reg 18 Preferred Sites Consultation; it would not create the suggested 'by-pass' (new residents will still have to just the town centre junction for toe town centre exacerbating issues); if so important, why is the land only proposed for safeguarding and not allocation; given the costs of such a scheme, unlikely development proposals could carry it - need detailed costings and only represents an exceptional circumstances if development can fully meet them; as the route no longer links to the A464 (north) where considerable traffic originates, only likely to serve the new extension and even then only a small part of journeys south to Wolverhampton; claims it will avoid traffic going into the town are incorrect. -Highway improvement at Five Ways/Innage Road: S106 funds already secured from existing development for this, unclear what else is needed; Innage Road can be addressed by stopping on-street parking, recently proposed but not implemented; development of the safeguarded land would exacerbate issues on Innage Road (additional traffic). -Provision of a significant range/choice of housing: Cannot forecast need beyond 2039, unreasonable to use such a factor to justify Green Belt release. -Future opportunity to connect A4169-A464: No technical evidence an appropriate link can be formed under the railway arch (available evidence indicates commercial vehicles could not use it making a one way system unworkable) or that Network Rail would support this; relevant land is not proposed for release from the Green Belt, undermining this argument. -</p> <p>Increased access to community facilities: Majority are north of the site (employment is to the east), so access cannot be improved; scale of development would increase traffic and make access worse; recent major housing development has not seen improvements to facilities (school or GP) so no guarantee such improvements would be delivered; proximity to Telford undermine potential for retail; open space is only for residents so of no overall benefit to the community.</p> <p>-Green Infrastructure gains and management of flooding: the land is already important green infrastructure (see Green Belt Assessment), therefore development of safeguarded land would harm provision; improvements to flooding are already programmed, additional development would likely exacerbate the issue and no evidence provided of how flooding would be reduced and why this cannot be achieved without development. -Improved access into the town, to recreational open space and countryside in the Green Belt: No evidence provided, as above consider access will be worsened with additional traffic; also difficult to substantiate large development will improve environmental quality of the Green Belt (Green Belt Review shows land would weaken Green Belt). The Water Cycle Study identifies constraints to water supply and sewerage. Full consideration needed of these constraints before major housing is proposed. Decisions on amendments to Green Belt boundaries could be deferred to the Neighbourhood Plan, if the draft Shropshire Local Plan establishes the need for such amendments, allowing significant community input (as per Broseley).</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0312	B014	Delete proposed allocations SHF018b/SHF018d. If the employment land guideline justifies it, allocate sites SHF018a/P14 and safeguard SHF018b.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings including sites SHF015 & SHF029 that will make an important contribution to meeting the housing needs of Shifnal and helping to conserve the important historical building of Beech House and its curtilage structures and land. These allocation complement the existing committed supply of 370 dwellings which further complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021 and which will deliver the 1,500 housing guideline figure for Shifnal. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. . Development guidelines for sites released for development will ensure the site design, layout and landscaping respects the character and significance of adjoining land uses. In the Green Belt, this is required to strengthen the boundary to the urban area to help maintain the openness and permanence of the Green Belt around Shifnal.	No
A0312	B015	Delete proposed safeguarded land. If the employment land guideline justifies it, allocate sites SHF018a/P14 and safeguard SHF018b. Identify proposed allocation SHF015/029 and land north of Upton Lane (below the skyline) as safeguarded land.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings including sites SHF015 & SHF029 that will make an important contribution to meeting the housing needs of Shifnal and helping to conserve the important historical building of Beech House and its curtilage structures and land. These allocation complement the existing committed supply of 370 dwellings which further complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021 and which will deliver the 1,500 housing guideline figure for Shifnal. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. . Development guidelines for sites released for development will ensure the site design, layout and landscaping respects the character and significance of adjoining land uses. In the Green Belt, this is required to strengthen the boundary to the urban area to help maintain the openness and permanence of the Green Belt around Shifnal.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0312	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 RAF Cosford	No	No	Yes	RAF Cosford should remain in the Green Belt as accepted by the Inspector on the previous Local Plan. Green Belt and SAMDev policies have not prevented nor delayed major development at the military base and Museum. There are no exceptional circumstances for releasing Green Belt land since the development proposals in the Plan could similarly be approved within existing policies despite the reasoning in the Plan that such development could not occur in the Green Belt. The release of RAF Cosford from the Green Belt is therefore not sound. The Strategic Site designation contradicts the exceptional circumstances given for removing the site from the Green Belt. The Strategic Site designation could encourage unplanned economic development at RAF Cosford not related to its military/museum functions. If the land is removed from the Green Belt, RAF Cosford should not be allocated as a Strategic Site but proposed solely for its military / museum functions. The lack of clarity for the proposed strategic allocation is at odds with paragraph 16 (f) of the NPPF and paragraph 4 point N of Policy S21 that requires 'opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt will be included as part of any new development proposals in accordance with Green Belt Policy SP11'.
A0312	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 RAF Cosford	No	No	Yes	The proposed Midland Air Ambulance Charity (MAAC) site is given different references within different documents - contrary to Gunning Principles. The size of the site is also unclear. The proposed site for the new Midlands Air Ambulance ground base has now been granted planning permission for the stated use as an exceptional circumstance in the Green Belt. There are, therefore, no longer any exceptional circumstances to justify its removal from the Green Belt or indeed to require any allocation of the site. The proposal to also allocate the site as a Strategic Site would encourage non-air ambulance development on the site in future undermining the stated reasons for removing the site from the Green Belt, contrary to NPPF Green Belt policy, which is not sound.
A0313	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Legal Compliance - General	No	No	Not Specified	Council should respond to the following issues before proceeding to approve and submit the Submission Local Plan to the Secretary of State. The issues to be addressed are: (1) the inadequacies with the evidence base used to inform this review process; (2) the methodology applied when calculating Shifnal's employment need, (3) justification on how other sites in Shifnal were ruled out in the sustainability appraisal and (4) the heritage assessment used to inform their site selection process and (5) why SC has chosen to take on the overspill of employment and housing development required by the Black County.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0312	B016	Do not remove RAF Cosford from the Green Belt and do not designate the site as a Strategic Site. The site should remain in the Green Belt.	Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No
A0312	B017	Delete the site allocation for the relocation and expansion of the Midlands Air Ambulance ground base.	Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site, including the aspirations of the Midland Air Ambulance Charity. In identifying proposed site allocations a comprehensive site assessment process has been undertaken. Within this assessment process it is considered that the MAAC is appropriately referenced to reflect its assessment, initially in isolation (within the Strategic Land Availability Assessment) and subsequently as part of a wider potential strategic site (within the assessment of potential strategic sites). The comprehensive site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No
A0313	B001	Council should respond to the following issues before proceeding to approve and submit the Submission Local Plan to the Secretary of State. The issues to be addressed are: (1) the inadequacies with the evidence base used to inform this review process; (2) the methodology applied when calculating Shifnal's employment need, (3) justification on how other sites in Shifnal were ruled out in the sustainability appraisal and (4) the heritage assessment used to inform their site selection process and (5) why SC has chosen to take on the overspill of employment and housing development required by the Black County.	Shropshire Council considers that a proportionate and robust evidence base has been prepared to inform the draft Shropshire Local Plan. Shropshire Council also considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Comments on the Sustainability Appraisal (SA) noted. Proposed changes to SA would have no material effect so are not considered necessary. Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.	No



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A0313	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Legal Compliance - Gunning Principles	No	No	Not Specified	Common Law imposes specific requirements on public consultation through R.V Brent LBC Ex p. Gunning {1985} 4 WLUK 200 which set four legal principles for consultations to be legal (known as the Gunning Principles). These are that (i) Plans must be at a formative stage before a final decision has been made or pre-determined by the decision maker. the Council have not published consultation responses following the Regulation 18 Plan prior to publishing the Regulation 19 Plan and no written responses have been prepared to permit the public and elected local representatives to consider the arguments for the Regulation 19 Plan. This is considered to imply that the proposals in the Regulation 18 Plan were not at a formative stage and the Regulation 19 Plan has already been pre-determined including the employment land allocations in Shifnal. The Council have not responded to inconsistencies in the recording of the hectarage of land for SHF018b and SHF018d suggesting the figures used to release Green Belt land are not based on sound evidence contrary to the Gunning principles. Council also advertised RAF Cosford and SHF018b/SHF018d as potential development sites outside of the Green Belt prior to the strategic sites consultation where the sites were proposed for release from the Green Belt suggesting the Council had predetermined their strategic sites which is re-enforced by the lack of response to objections and queries following the consultation. (ii) There is sufficient information to give 'intelligent consideration' to the information provided. A number of evidence documents are missing, incomplete or out of date including the Local Transport Plan, Annual Monitoring Report, Tree & Woodland Strategy, Health and Well Being Strategy expires in 2021, no formal Estate Plans have been published to support Policy SP15, the Tourism Economic Impact Report is 2013, Landscape Characterisation Assessment is 2006. Information on the website, such as the proposed Local Plan period and the Local Development Scheme have not been kept up-to-date. There has been a lack of clarity over the hectarage of the employment allocations and the densities for the housing allocations in Shifnal, double counting in the calculation of the land area to be made available on the employment allocations which impacts on the release of Green Belt land. Inaccuracies in the Sustainability Appraisals. Therefore, how can the public be expected to judge the soundness of policies and proposals in the Plan, when crucial parts of the evidence are unavailable for the public to view. This is especially important when these proposals are likely to impact on the need to release Green Belt land. As well as going to the soundness of the plan and compliance with Government guidance, the failure to make accessible to the public evidence relied on by the Council, is contrary to the legal requirement in the Gunning case to permit intelligent consideration of accurate information bringing the soundness of the plan into question. (iii) There is adequate time for consideration and response to provide sufficient opportunity for consultees to participate in the process. There has been insufficient time through the review process with Regulation 18 Pre-Submission consultation permitting only 8 weeks during the summer holiday period. The Regulation 19 consultation was conducted in a similar manner over the Christmas period and national lockdown (addressed through an extension of the period) with libraries closed preventing access to the consultation documents that included matters affecting the whole County, 35 new policies referring to 50 evidence documents with appendices and a large number of new evidence documents contributing to the 11,000 page evidence base. In contrast, the Preferred Scale & Distribution of Development and Issues & Options Consultations that avoided holiday periods or the Preferred Sites and Strategic Sites consultation for just 4 sites that covered longer periods of 9 and 10 weeks. The period allowed was also reduced by the fact that several pieces of evidence quoted in the Plan were not put on the evidence base website at the start of the consultation period and nearly half was not put on the evidence base at all (this included the Infrastructure and Implementation Plan, Economic Development Needs Assessment, Transport Plan and Estate Plans) contrary to the statement on the Councils website on this consultation. This also contrasts with consultations on other public documents including a 12 week consultation on the revised Statement of Community Involvement that is 27 pages; 8 weeks for the Community and Rural Strategy that is 22 pages; and 12 weeks for the Cultural Strategy that is 33 pages. It is considered that this inconsistency is further evidence that this consultation is flawed and legally questionable. (iv) 'Conscientious consideration' must be given to the consultation responses before a decision is made. It is considered that the Council have not published evidence showing how consultation responses have been taken into account. The publication of a summary of responses does not demonstrate how feedback has been considered and how it has been incorporated into the next review phase or why the Council took decisions contrary to recommendations in the consultation responses.
A0313	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Duty to Co-operate	No	No	Not Specified	The duty to cooperate is a legal requirement for council's and statutory bodies to work together on strategic cross-boundary issues. In SC's case the county is adjoined by several local authority areas, and there are areas beyond this with a functional relationship, most notably the Black Country. As previously set out, there is no information contained in SC's evidence base which demonstrates why SC are proposing to include 1,500 dwellings to meet the Black Country needs. Without this key information being made publicly available, we cannot ascertain whether or not the duty to cooperate, under the Localism Act and NPPF has been conducted in an appropriate manner.
A0313	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Statement of Community Involvement	No	No	Not Specified	The Statement of Community Involvement (SCI) has not been regularly reviewed as required by Government guidance. The Council has also failed to comply with their SCI. The Town Council and local community have previously submitted detailed comments on locally relevant issues at each consultation stage, but SC have failed to respond to those concerns showing how they have taken those views into account or why they have not accepted them. This does not constitute effective or meaningful dialogue as the community involvement has been one way.
A0313	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Statement of Common Ground	No	No	Not Specified	Paragraph 27 of the NPPF sets out that 'authorities should produce, maintain, and update one or more statement(s) of common ground, throughout the plan-making process'. It goes onto state that 'such statements should be made publicly available throughout the plan-making process to provide transparency'. One of the tests of soundness is that a Plan must be effective and that cross-boundary matters that have been addressed are to be evidenced by the statement of common ground. This has not been demonstrated by SC and the current review process is unsound. As set out above SC are proposing to include 1,500 dwellings to meet the Black Country needs and no statement of common ground was submitted to accompany this consultation. Without this statement, there was no information on identified needs as required by paragraph 012 (reference ID: 61_024012-20190315) of the Plan Making guidance, for the public to understand the reasoning for this change. The NPPF requires that such statements should be provided throughout the preparation of the plan and not at the end. As members of the public have not been consulted on this, the evidence base is clearly flawed.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0313	B002	See summary of main issues.	<p>Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p>	No
A0313	B003	See summary of main issues.	<p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No
A0313	B004	N/A	<p>Shropshire Council strongly considers that it has met the requirements of the Statement of Community Involvement. The consultation process undertaken is also considered to comply with the Gunning Principles and national legislation.</p>	No
A0313	B005	N/A	<p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0313	B006	Sustainability Appraisal	Sustainability Appraisal	No	No	Not Specified	Shropshire Council failed to satisfy Section 19 of the Planning and Compulsory Purchase Act 2004(PCPA), Regulation 5(1) and Regulation 12 and Schedule 3 of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) and the European Directive 2001/42/EC in Recital 17 to use the environmental report to inform the Plan and generally in “the assessment of the effects of certain plans and programmes on the environment”. The Council also failed in relation to the Strategic Environmental Assessment and Sustainability Appraisal guidance note Paragraphs 002 to undertake an iterative process and Para 018 to consider all reasonable alternative sites and the reasons for setting them aside. The preparation of the Pre-Submission Plan is therefore legally flawed and unsound. This failure is endorsed by Seaport Investments Ltd 2002 NIQB 62 that there must be parallel development of the environmental report and draft plan. In Berkeley v SoS Others 2002 3 WLR & Save Historic Newmarket Ltd v Forest Heath DC (2011 EWHC 606, and Royal Brompton & Harefield NHS Foundation Trust v Joint Committee of Primary Care Trusts (2011) EWHC 2986, there must be an environmental statement in a single accessible format prepared from the start of the process and presenting relevant environmental information with a non-technical summary to assist potential consultees. The Sustainability Appraisal fails to properly assess sites against all scoping objectives especially proximity to public transport (SO6 incorrectly recorded as quality of agricultural land), reduction of CO2 emissions (SO12) and adaptation and mitigation to climate change (SO13). The SA used to inform the site assessments failed to assess these key Scoping Objectives in the Pre-Submission Plan and Strategic Sites consultation rendering the process not legally compliant and producing site selection decisions that are inadequate, incorrect and unintelligible under the Gunning Principles. Site SHF018d was also not included in the SA and not assessed individually or against reasonable alternatives including SHF018a with a lower sustainability scoring. This indicates a pre-determination of the selected sites contrary to the Gunning Principles requiring consultation at a formative stage before final decisions are made. The SA on the Preferred Scale and Distribution (PSD) consultation stage was prepared on the basis Shifnal would receive 16ha of employment land and would minimise the need for additional car based transport. The Preferred Sites (PS) stage increased the amount of employment land for Shifnal to 40ha, but the SA failed to assess public transport criteria and to assess the SHF018d individually or against alternatives. The Council cannot show the increase in employment from 16 to 40ha and the allocation of Shif18d for employment use, would be sustainable development as these matters were not appraised at the appropriate time. The SLAA Report 2018 did not present a map with sites boundaries and these boundaries could only be ascertained through a web-site search without any cross referencing in the SLAA report. There was no map in the SA for the public to identify the location and boundaries of sites appraised. Case law states that a disparate collection of documents traceable only by a person with a good deal of energy and persistence does not satisfy legal requirements on making documents available to the public.
A0313	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 - Housing	No	No	Not Specified	Policy SP2 requires, from 2016 to 2038, the provision of around 30,800 new dwellings at around 1,400 dwellings per annum. SC need to clarify the uplift of this housing target to 30,800 above the minimum 25,894 new dwellings required by central Government and above the demographic need of only 20,746 new dwellings. SC also need to explain why 1,500 dwellings for Black Country needs is also accommodated in the proposed housing provision despite their being no change to the standard methodology for most West Midlands local planning authorities except for Birmingham, Wolverhampton, Coventry and Stoke-on-Trent. The existing 'standard methodology for calculating housing requirements is based on the lower 2014-household projections (not the 2018 based projections) for both Shropshire and Telford & Wrekin which would permit SC to reduce their housing targets rather than increase them to 30,800 dwellings.
A0313	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 - Employment	No	No	Not Specified	Policy SP2 requires, from 2016 to 2038, around 300 hectares of employment land at around 14ha of employment land per annum. Appendix 6 of the Employment Land Supply states that the strategic employment land supply will be 414ha and it is unclear how this figure contributes to the employment land requirement nor why the two figures are different. The 300ha requirement is considered sufficient to deliver enough jobs to achieve a sustainable balance with their housing requirement but SC need to explain how this balanced growth projection was calculated. The proposed 30,800 dwellings and 300 ha of employment land seem disproportionate and as an example, guideline employment land figure for Shifnal was previously 16 ha but increased to 41ha in the Pre-Submission Draft SLP. SC indicate the 1,500 new dwellings proposed at Shifnal should equal circa 1,500 new jobs. Each job needs on average 42.25 sq.m of finished floorspace equal to 40% of the entire employment site. This means, an additional 40% needs to be added to the overall total. The calculation is 1,500 new dwellings x 42.25 sq.m of floorspace x 40% equal to 15.84 ha. For the figure to increase to 41ha, the 40% provided by SC appears to be already included in the balanced growth calculation of 16 ha.SC need to explain the methodology to calculate Shifnal’s employment need. The employment land supply figure identified by SC also fail to account for employment land proposed at RAF Cosford (Aviation Academy, 1500 additional military personnel; new air ambulance development). This additional land puts the actual employment land figure at +50% above the 300ha requirement and so, there is a clear over provision of employment land over the next plan period.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0313	B006	See summary of main issues.	The Council considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.	No
A0313	B007	The existing 'standard methodology for calculating housing requirements is based on the lower 2014-household projections (not the 2018 based projections) for both Shropshire and Telford & Wrekin which would permit SC to reduce their housing requirement from 30,800 dwellings.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0313	B008	The actual employment land available in the County +50% higher than the 300ha requirement and so, the employment land requirement may be reduced over the next plan period. The employment land guideline for Shifnal should also be reduced to 16ha.	In order to achieve the proposed employment land requirement, respond to the wider range of employment uses and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038. Shropshire Council also consider that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0313	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	No	No	Not Specified	Paragraph 7 of the NPPF sets out that 'the purpose of the planning system is to contribute to the achievement of sustainable development'. The draft plan has not been proactively prepared in accordance with the three overarching objectives, which help form sustainable development. Significant weight is placed on the economic objective for Shifnal and the wider district but very little on the social and environmental objectives. The proposed inclusion of 41 ha of employment land and 1,500 new dwellings in Shifnal will lead to substantial losses of Safeguarded Land and Green Belt eroding the natural green space between Shifnal and Tong. Contrary to paragraph 9 of the NPPF, the local circumstances, needs and opportunities for Shifnal are not considered and the proposed urban extension will have a detrimental effect on the surrounding landscape, road infrastructure, schools and health services. The proposed Draft Plan is therefore unsound. There is no recognition in the Pre-Submission Draft SLP of the potential impacts of Covid-19 on the local economy, including increased homeworking reducing the need for employment land. A more conservative estimate of the employment land requirements should be undertaken, with reconsideration of the requirement waiting until the next plan review, reassessing the economic situation when the full effects of Covid-19 can be assessed. Otherwise, there is a high likelihood that employment will not keep up with the high housing figure proposed and so balanced growth will not occur nor will sustainable development be achieved in accordance with Policy SP4.
A0313	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	No	No	Not Specified	Policy SP6 sets out that new development should ensure the health and well-being of individuals, communities and places. The location of Shifnal's employment land to the north east and future strategic housing to the south and west is contrary to the Neighbourhood Plan and the views of the local community on the future development of their town. A large proportion of Shifnal's existing and new housing stock south and west is split from the proposed employment land to the north east. The existing central railway line makes access from the south and west to the new employment land only achievable through the centre of Shifnal via the Market Place, Victoria Road, Braford Street and Aston Street junctions on a road network too constrained to carry the proposed increased transport movements throughout the town. This is assessed in 'Comments on the Effect on Traffic in Shifnal Caused by the Proposed Employment Land Development (Land off Stanton Road)'. In addition, the infrastructure improvements including highways improvements required by the recent inclusion of 1,100 new dwellings have yet to be implemented in Shifnal and Shifnal does not have the infrastructure or facilities to accommodate 41 ha of employment land and a further 1,500 new dwellings, in addition to the 1,100 new dwellings being built out. The employment and housing allocations are disproportionate to the existing settlement, fail to maintain or enhance the vitality of Shifnal and have a harmful impact on the social wellbeing of the local community, risking the erosion of community cohesion. SC must assess the proposed cumulative growth in Shifnal over this relatively short time from 2012 – 2021 and through the 2038 which will have a negative impact on social wellbeing and social cohesion within Shifnal contrary to Policy SP6.
A0313	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	No	No	Not Specified	SC concluded that exceptional circumstances exist for the release of Green Belt land without properly satisfying NPPF paragraph 137 to demonstrate that all other reasonable development options for meeting identified needs have been properly assessed. This omission affects land released for housing and employment uses on sites allocated for development to 2038 and also land safeguarded for future development. The evidence base for the Local Plan did not provide the reasons why other sites were rejected and did not consider other opportunities for industrial development within neighbouring Telford and the sub-region (Staffordshire, Wolverhampton, West Midlands etc) before changing the Green Belt boundaries around Shifnal. Shifnal Town Council suggested SHF018a as a more sustainable option than SHF018b/SHF018d to meet the employment needs of the town and no explanation was provided for rejecting SHF018a as safeguarded land. The land that is safeguarded is not justified in the evidence base, Sustainability Appraisal or Proposals Map. There is also conflict in Policy S15.1 between Point 4 which seeks to promote the local and sub-regional role and functions of Shifnal and Point 7 which protects the safeguarded land from development except in very special circumstances. These very special circumstances relate more to the sub-regional role of the town than to the local objectives in the Neighbourhood Plan which is a material consideration for the Local Plan. This also reflects an objective in the exceptional circumstances statement that Shifnal should perform the same role as Bridgnorth even though Shifnal is a smaller settlement, located close to the strategic centre of Telford. Shifnal is also expected to be influenced by development of the strategic site on the former Ironbridge Power Station. The release of Green Belt land for development and safeguarding cannot be justified as all reasonable options for development have not been assessed and exceptional circumstances for the release of this Green Belt land have not been properly identified.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0313	B009	A more conservative estimate of the employment land requirements should be undertaken, with reconsideration of the requirement waiting until the next plan review, reassessing the economic situation when the full effects of Covid-19 can be assessed.	<p>The draft Shropshire Local Plan seeks to achieve the sustainable development of Shropshire. All references to sustainable development within the draft Shropshire Local Plan recognise the three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). This is recognised within the introduction to the draft Shropshire Local Plan, which states "the pursuit of sustainable development is at the heart of the planning process" and that "achieving sustainable development will mean that decision takers must look at all facets of sustainability in arriving at decisions: economic, social and environmental. In all cases a balance of considerations is needed, and it is accepted this will often lead to a variety of opinions being expressed."</p> <p>The proposals within the draft Shropshire Local Plan have been informed by a comprehensive Sustainability Appraisal process.</p> <p>Draft Policy SP4 is not seeking to define sustainable development, rather it is providing clarity on how the presumption in favour of sustainable development introduced within the NPPF would apply, if relevant, in Shropshire.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Comments on the Sustainability Appraisal (SA) noted. Proposed changes to SA would have no material effect so are not considered necessary.</p> <p>With regard to the proposed safeguarded land, it is noted that the National Planning Policy Framework (NPPF) states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development".</p>	No
A0313	B010	Council must assess the proposed cumulative growth in Shifnal over this relatively short time from 2012 – 2021 and through the 2038 which will have a negative impact on social wellbeing and social cohesion within Shifnal contrary to Policy SP6.	The Council considers that there is no conflict between Policy SP6 and its strategy for Shifnal. The latter forms part of the overall approach to development in Shropshire which is aimed at achieving all facets of sustainable development, social, economic and environmental.	No
A0313	B011	See summary of main issues.	<p>It is understood that this representation primarily relates to the proposed strategy for Shifnal and not the content of draft Policy SP11. Issues raised relating to Shifnal are addressed in the relevant settlement section.</p> <p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0313	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	No	No	Not Specified	Policy SP12 refers to the employment requirement to deliver around 300 ha of employment land throughout the plan period. The spatial strategy identified to achieve these objectives is also set out in Policy SP12. There is no explanation in this Policy nor in the description of the strategy to explain the reasons why proposed employment allocation SHF018d and SHF018b have been brought forward in Shifnal over other sites and SHF018a, in particular. This omission makes it difficult to establish whether the plan led approach is successful in protecting and improving areas of higher landscape value. In the evidence presented as part of SC's Highways Assessment, it is unclear why site 2- plots SHF018b & d are identified as having low or medium highways impact, whilst adjoining sites 1 and 3 are considered as having a high to very high highways impact. SC also need to clarify the methodology used for calculating Shifnal's balanced growth and resulting employment need.
A0313	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	No	No	Not Specified	Policy SP14 reiterates that development in the 'strategic corridors through the Green Belt or Shropshire Hills Area of Outstanding Natural Beauty will be subject to appropriate national and local policy. We consider that the proposed 41ha of employment land at Shifnal is at conflict with paragraph 137 of the NPPF, because exceptional circumstances to justify the Green Belt release in the area, has not been provided throughout the review process. The Pre-Submission Draft SLP refers to the role that Shifnal would play to provide strategic economic development in the M54 strategic corridor. The employment land proposed at RAF Cosford has not been included in the overall calculations to assess the need and it should be acknowledged that there is a plentiful supply of already committed employment land in neighbouring authorities in this corridor. It is an unsustainable assumption that Shifnal would attract such strategic employment development to justify the release of such large areas of Green Belt.
A0313	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	No	No	Not Specified	There is no justification for Policy SP15 to support the non-statutory plans of larger estate owners. The implementation of Policy SP15 would support the long-term vision and objectives of Bradford Estates to promote a new settlement at Tong providing support in principle for a development not currently proposed in the Local Plan housing requirement or housing supply projection. This would prejudice the ability of the public to comment on the specific development proposal and to influence the degree of future flexibility in permitting further development. This is despite the intention to have "meaningful public consultation" which could be open to wide interpretation depending on the point of view of the promoters or planning authority etc. Accordingly, there is a concern that Policy SP15 allows Bradford Estates to promote this scheme without any justification for the special privileges given to larger landowners in the County. SP15 prejudices the community against larger landowners which can be argued as being contrary to the Equality Act.
A0313	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17	No	No	Not Specified	The strategic housing and employment allocations in Shifnal do not conform with Policy DP17 because they are not properly assessed against other sites in the Sustainability Appraisal nor are reasons given for rejecting alternative sites contrary to Section 13 of the NPPF (Protecting Green Belt Land). The Sustainability Appraisal (pages 91 – 96) finds Sites SHF018b and P15b score poorly for overall sustainability and much of the proposed 'safeguarded land also gets lowish scores but are included in the proposed sites. The extension east of Upton Lane (SHF018d) is contrary to national policy, as no exceptional circumstances are provided for its release. SC do not correctly apply the findings of the Green Belt Review Assessment to SHF018d which constitutes an unacceptable encroachment into the countryside, with no recognisable, permanent boundary, causing High Harm to the Green Belt and extending east of Upton Lane which is a clearly defined Green Belt boundary. This indicates no exceptional circumstances for this land release given the availability of alternative sites causing Less Harm particularly SHF018a now proposed as safeguarded land. SC state the Green Belt land releases for employment use (SHF018b and SHF018d) are of Moderate to High Harm but land east of Upton Lane has a High Harm to the Green Belt and landscape. SHF018d is part of Broad Area 29 In the Green Belt Review containing the proposed MAAC site intended to be removed from the Green Belt further causing moderate to high harm with no justification for these Green Belt land releases.
A0313	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP21	No	No	Not Specified	Policy DP21 sets out that, "the safeguarding of people and property and mitigation of the effects of climate change, will be achieved by directing development to areas at least risk of flooding". SC's Strategic Flood Risk Assessment sets out that the majority of Shifnal is located within Flood Zone 1, with the area immediately around the Wesley Brook located within Flood Zones 2 and 3 (1 being low risk and 3 being high). This report has also identified that Shifnal has one of the highest surface water flood risks in the county and would be the most vulnerable to cumulative increases in flood risk due to new development. With most of this risk coming from Wesley Brook being a source to its confluence with River Worfe. In accordance with paragraph 157 of the NPPF it should be noted that the Sequential and Exception Test of Shifnal's proposed allocated sites in the Pre-Submission Draft Local Plan does not fully recognise Shifnal's identified surface water flood issues.
A0313	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23	No	No	Not Specified	To date no strategic plan has been presented to illustrate how the Development Strategy for Shifnal will ensure the historic character of the town will be preserved or enhanced after the towns proposed extension in accordance with the objectives of Policy SP23. Evidence for the strategic allocations advised that heritage assessments were produced to inform the site selection process but it remains unclear as to how the historic environment was considered in the evidence base or from the Sustainability Appraisal contrary to Paragraph 185 of the NPPF which would question the soundness of the Plan. The Landscape and Visual Sensitivity Assessment also confirms the majority of parcels have visual and landscape sensitivity issues for existing landscapes, listed buildings and conservation areas. The allocations will change the appearance of the historic character of Shifnal, there will be intensification of traffic flows through the centre of Shifnal which is a factor that Historic England regards as affecting historic towns with development of transport infrastructure also affecting historic landscapes and damaging heritage assets.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0313	B012	Policy SP12 refers to the employment requirement to deliver around 300 ha of employment land throughout the plan period. The spatial strategy identified to achieve these objectives is also set out in Policy SP12. There is no explanation in this Policy nor in the description of the strategy to explain the reasons why proposed employment allocation SHF018d and SHF018b have been brought forward in Shifnal over other sites and SHF018a, in particular. This omission makes it difficult to establish whether the plan led approach is successful in protecting and improving areas of higher landscape value. In the evidence presented as part of SC's Highways Assessment, it is unclear why site 2-plots SHF018b & d are identified as having low or medium highways impact, whilst adjoining sites 1 and 3 are considered as having a high to very high highways impact. SC also need to clarify the methodology used for calculating Shifnal's balanced growth and resulting employment need.	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. It is considered that an employment land provision at Junction 3 of the M54 Motorway is not required during this Plan period to 2038. The employment policies SP12, SP13 and SP14 would still be sufficiently flexible to accommodate such an outcome in the event that the circumstances determining the strategy for the Local Plan were to change considerably during the Plan period.	No
A0313	B013	See summary of main issues.	Shropshire Council has undertaken a robust and proportionate site assessment process to inform the identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt including land at Shifnal proposed to be allocated for employment development and land proposed to be safeguarded for consideration in future plans for the growth and development of the town. The draft Local Plan should seek to achieve sustainable development for those areas where a planned strategy is presented in the Local Plan including Shifnal. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered to be appropriate for the draft Local Plan to address the need for new employment to be generated in Shifnal within the planned strategy for the town.	No
A0313	B014	There is a strong objection to policy SP15 and its potential interpretation which may prejudice the future protection of the Green Belt and public participation on future development proposals and the Council must address the omission of the Estate Plans in the Local Plan evidence base by making them available on the public.	Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal. Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.	No
A0313	B015	See summary of main issues.	Policy DP17 requires development proposals to assess their impact on landscape and visual amenity and will apply to any planning applications on sites SHF018b, P15b and SHF018d. The principles behind policy DP17 have been applied through the Sustainability Appraisal and Site Assessment process which considered the landscape and visual sensitivity of all SHLAA sites based on the Council's Landscape and Visual Sensitivity Study.	No
A0313	B016	See summary of main issues.	The application of the Sequential and Exception Tests to all proposed site allocations is based on the information contained in the Council's Strategic Flood Risk Assessments (Levels 1 and 2) and follows national planning policy and guidance. As such the Council feels it is accurate and appropriate.	No
A0313	B017	The heritage assessments informing these decisions should be published to show the mitigation for the future conservation and preservation of heritage assets in Shifnal town centre.	Policy DP23 will ensure that heritage assets in Shifnal are safeguarded in response to development proposals. The Sustainability Appraisal and Site Assessment process considered heritage assets throughout and the results are available on the Council's website. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0313	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP25	No	No	Not Specified	Shifnal has limited investment in infrastructure (including roads and footpaths, new medical centre, education and leisure facilities) to support the expansion of the town despite the recent 1,100 new dwellings recently approved and currently being built out, resulting in some 40% increase in the town's population. The Pre-Submission Draft SLP paragraph 5.215 highlights that the future housing extension to south and west of the town which is safeguarded) will provide improvements at Five Ways and Innage Road. However, S106 funding has already been obtained from developers of recent large housing developments for improvements to Fiveways to meet the increased traffic needs of the town. Further to this, no practical infrastructure improvements have been identified to accommodate the proposed growth of the town.
A0313	B019	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Shifnal Town Strategy	No	No	Not Specified	Council need to present evidence to justify the release of Green Belt land for safeguarding for future development beyond 2038 to the east, south and west of Shifnal. This designation implies the principle of development on this land is accepted despite the community not being consulted on this prior to including the land the Plan. The safeguarding of this significant area of land will also place further strain on Shifnal should the County be unable to demonstrate an adequate housing land supply in the short to medium term. Council need to justify the reason for considering Green Belt policies in the event that an earlier development proposal was considered for the safeguarded land under very special circumstances and whether the development of the land would be afforded the same weight as Green Belt land. Council need to demonstrate the very special circumstances for the release of allocations SHF018b and SHF018d and show that this omission will not provide a precedent for the release of further safeguarded land in a future review of the Local Plan. Council also need to have regard to the conservation of the historic character of Shifnal and make available any submitted heritage assessments to illustrate the proposed mitigation of to conserve and enhance the historic character of the town. The Local plan also needs to recognise the underlying consensus of the local community set out in the objectives of the Shifnal Neighbourhood Plan that any development should retain the small market town character as a principle attraction of the town. Council should justify the large release of Green Belt land which are contrary to national policy including paragraph 006 of the Planning Policy Guidance and which undermine the Shifnal Neighbourhood Plan. It is recognised that the Neighbourhood Plan only goes to 2026, the principle issues brought forward by the community and underpinning the Plan, are still relevant and should be reflected in the Local Plan proposals. The proposals are clearly a significant departure from the Neighbourhood Plan and the community and Shifnal Town Council has understandably raised the question about whether their efforts to produce the Plan were worthwhile. If the proposals were to go ahead this would naturally cause a great deal of local resentment. Council take into account both Market Drayton and Broseley Neighbourhood Plans, while Shifnal's Plan has not been acknowledged. We would like to understand why this is the case.
A0313	B020	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Shifnal: SHF018b/SHF018d - Traffic Impacts	No	No	Not Specified	The proposed employment development land located off Stanton Road will create a substantial increase in traffic on Stanton Road and Aston Street even if commercial vehicles could be effectively restricted from using this route. The main commercial centre in East Shropshire is Telford, which lies to the west of Shifnal, and Aston Street is the direct route to Telford from the proposed development. Vehicles wishing to access and egress from the west will use the Aston Street / Stanton Road route as it is more than 8 kilometres shorter than the A41 / M54 route to Junction 4 of the M54. The A41/Stanton Road junction is also a site of morning and evening stationary traffic for vehicles trying to travel in the direction of the M54 Stanton Road and Aston Street are not suitable for carrying the additional volume and increased unit weight of the generated traffic because: (1) The junction with Bradford Street and the A464 trunk road is already well beyond capacity and causes substantial delays and congestion at peak periods. Proximity of buildings within the Shifnal conservation area preclude any opportunity of additional land take for upgrading. (2) The turning movements at this junction currently disrupt traffic flows on both the A464 and the A4169. (3) The existing carriageway is narrow (6 metres) and cannot be widened due to the proximity of buildings. (4) The existing carriageway construction is not engineered and is not capable of taking additional and heavier traffic. It is currently in a poor state of repair. (5) The station approach and the main shopping car park access onto Aston Street, both junctions having severely impaired sight. (6) Aston Street residents are obliged to park on Aston Street causing single line traffic flows as there is no access to the rear of their properties. (7) Aston Street dwelling doorways access directly onto the pavement, and the increase in noise, dust and vibration will be detrimental to their environment. (8) The Bradford Street/ Aston Street junction is crossed by the principal walking route to the train station from the town centre including provision for those with impaired sight and wheelchair users. (9) The existing pedestrian footpaths at the junction are narrow and hazardous.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0313	B018	The Council need to acknowledge the infrastructure needs of the community and their concerns at the infrastructure capacity of the town and where and when further infrastructure investment will be provided in advance of further developments in Shifnal.	The infrastructure needs of Shifnal will be taken into account through the Strategic Infrastructure Implementation Plan and Place Plan process.	No
A0313	B019	Council should not remove the proposed safeguarded land from the Green Belt and should instead demonstrate the very special circumstances for the release of land for further development. The Council should also publish any submitted heritage assessments to illustrate the proposed mitigation to conserve and enhance the historic character of the town should any land be released from the Green Belt for development.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. . Development guidelines for sites released for development will ensure the site design, layout and landscaping respects the character and significance of adjoining land uses. In the Green Belt, this is required to strengthen the boundary to the urban area to help maintain the openness and permanence of the Green Belt around Shifnal. On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038.	No
A0313	B020	See summary of main issues.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038. It is recognised that whilst housing development may cease on the completion of the proposed 1,500 dwellings, it is proposed that employment development will commence at an early stage following the adoption of the Local Plan. This may result in traffic using the Aston Street junction subject to the impacts of the now programmed Town Centre (highway) Enhancement Scheme. It is proposed that the impacts of this scheme be monitored to assess the implications for the Aston Street junction with a view to considering further measures to manage the highway capacity of this junction.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0313	B021	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 RAF Cosford	No	No	Not Specified	Policy S21 designates RAF Cosford as a strategic site to be removed from the Green Belt to complement and enable the growth aspirations in the east of the County. The potential employment and training provision on this strategic site are expected to facilitate the sustainable growth of the local economy and contribute to meeting the employment needs of nearby Albrighton. The strategic site consists of around 221ha of land, over half of which is previously developed land but the land within the site and the aspirations for future development are not included in the identified need for 300 ha of employment land over the next plan period. The Council therefore need to demonstrate the exceptional circumstances for this land release in the Green Belt contrary to paragraph 135 of the NPPF. Policy S21 will not prevent coalescence between settlements nor will it assist in safeguarding the countryside from encroachment instead future development will have fewer restrictions leading to future sprawl of different types of employment uses and requiring further Green Belt release. This has resulted in a contradiction in the Plan between RAF Cosford being removed from the Green Belt to meet the development aspirations of the military and museum and releasing the land as a Strategic Site for other major developments without the constraints of the Green Belt. Significant development to date at RAF Cosford and Cosford Museum have already been permitted and developed under existing planning policies CS5, MD6 without requiring uncontrolled Green Belt land releases. The lack of clarity for the proposed strategic allocation is at odds with paragraph 16 (f) of the NPPF and paragraph 4 point N of Policy S21 that requires 'opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt will be included as part of any new development proposals in accordance with Green Belt Policy SP11'.
A0313	B022	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 Midlands Air Ambulance	No	No	Not Specified	Shifnal Town Council also note that the MAAC site is being promoted as part of the RAF Cosford Strategic Site and not as a one-off allocation for the MAAC. SC have no controls to ensure that the site is only developed for MAAC. Planning permission has now been granted as an exception for MAAC in the Green Belt, so this site no longer needs removing from the Green Belt or provided as a strategic allocation.
A0314	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0314	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0313	B021	Need to understand how SC intend to mitigate the resulting impacts caused from the proposed Green Belt release on the wider landscape. Surely the openness of Green Belt will not be retained, so we are not sure why para 4n has been included.	<p>Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken. The comprehensive site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. The site assessment process also included consideration of landscape/visual amenity and strategic issues such as the relationship to the existing built form. Indeed, the extent of the proposed strategic site has been informed by consideration of the need to maintain an appropriate gap between RAF Cosford and Albrighton.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Furthermore proposed site guidelines recognise the need to make compensatory improvements to the Green Belt, consistent with national policy, including through appropriate additional planting to improve visual amenity and biodiversity and creation of linkages to green infrastructure networks and corridors beyond the site.</p>	No
A0313	B022	The proposed site for the MAAC no longer needs removing from the Green Belt or provided as a strategic allocation.	<p>Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site, including the aspirations of the Midland Air Ambulance Charity.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0314	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0314	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0314	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0314	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0314	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0315	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0315	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0314	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0314	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0314	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0315	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0315	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0315	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0315	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0315	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0315	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0315	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0315	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0316	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0317	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0317	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0316	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0317	B001	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0317	B002	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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A0317	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0317	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0317	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0318	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0318	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0317	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0317	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0317	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0318	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0318	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0318	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0318	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0318	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0319	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0319	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0318	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0318	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0318	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0319	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0319	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0319	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0319	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0319	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0320	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0320	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0319	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0319	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0319	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0320	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0320	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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A0320	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0320	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0320	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0321	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0320	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0320	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0320	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0321	B001	Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored. Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.	Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0321	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030).</p> <p>At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers ‘.. will make provision for the needs of the town and surrounding hinterland...’?</p> <p>In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?</p>
A0321	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth.</p> <p>However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?</p>
A0321	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference?</p> <p>Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters?</p> <p>Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will ‘parking facilities’ and ‘dedicated park and ride service’ be located, how will public transport services be funded and how does this integrate into development north of the A458?</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0321	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0321	B003	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0321	B004	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0321	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.
A0321	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.
A0321	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate Nosie, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0321	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0321	B005	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0321	B006	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0321	B007	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No
A0321	B008	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0322	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	No	No	Not Specified	<p>The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030).</p> <p>At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers ‘.. will make provision for the needs of the town and surrounding hinterland...’?</p> <p>In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?</p>
A0322	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	No	No	No	<p>In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth.</p> <p>However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?</p>
A0322	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	No	No	No	<p>Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site.</p> <p>Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18.</p> <p>It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated?</p> <p>BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0322	B001	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0322	B002	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0322	B003	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0322	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	No	No	No	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.
A0322	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	No	No	No	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.
A0322	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	No	No	No	Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0322	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	No	No	No	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate Nosie, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0323	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	Not Specified	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0322	B004	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0322	B005	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0322	B006	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0322	B007	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No
A0323	B001	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0323	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	Not Specified	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0323	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	Not Specified	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0323	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	Not Specified	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0323	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	Not Specified	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0324	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0323	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0323	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0323	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0323	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0324	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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A0324	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0324	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0324	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0324	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0325	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0324	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0324	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0324	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0324	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0325	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0325	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0325	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0325	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0325	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0325	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0325	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0325	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0325	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0326	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.1 Wem	Not Specified	No	Not Specified	The bowling green is no longer in use (since 2017). The village shop has closed (in Oct 2020). Therefore Clive does not comply with Hub status
A0327	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.1 Wem	Not Specified	No	Not Specified	The bowling green is no longer in use (since 2017). The village shop has closed (in Oct 2020). Therefore Clive does not comply with Hub status



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0326	B001	Clive does not have a high enough score for Hub status once the corrections relating to the bowling green and shop are made.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub. Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0327	B001	Clive does not have a high enough score for Hub status once the corrections relating to the bowling green and shop are made.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub. Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0328	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.
A0328	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '.. will make provision for the needs of the town and surrounding hinterland...'? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?
A0328	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?
A0328	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0328	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No
A0328	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0328	B003	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0328	B004	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0328	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0328	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0328	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each other regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.
A0328	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to be located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0328	B005	Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030. Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision. Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators." Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.	No
A0328	B006	Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional. Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat. Explain the measures to be taken to improve air quality in Bridgnorth. Explain how noise and odour will be mitigated. Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal. Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology. Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.	No
A0328	B007	Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing. Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences. Provide details of how noise and odour can be mitigated in these circumstances.	Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection. Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity. Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market. Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.	No
A0328	B008	What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur. Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458. Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0329	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0330	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0329	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0330	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0331	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	No	No	No	Promotion of the Regulation 19 Consultation on the Draft Shropshire Local Plan has been inadequate, local Parish Council's were unaware of the consultation and local people only found out if they had computers and registered with Shropshire Council. Consider Regulation 19a of the Town and Country Planning Act (TCPA) has not been achieved. Consider the land use and environment elements of the Tenbury Wells and Burford Parish Plan have not been achieved.
A0331	B002	Sustainability Appraisal	Sustainability Appraisal (BUR004)	Not Specified	No	No	Table 1.2 of the Sustainability Appraisal (SA) rates site BUR004 as 'Good', but consider the scoring is incorrect as scoring options in Table 2.6 of the SA are not met. Specifically: -SO1: BUR004 is in an area rich in habitats/species and development would indirectly impact on them (accept BUR004 is not officially protected but is diverse). -SO2: Development of BUR004 would not encourage a strong and sustainable economy throughout Shropshire. Rather, its development will negatively affect local farmers despite a lack of need for more housing (plenty of supply in the immediate area including Tenbury Wells). -SO2: Burford/Tenbury Wells is a rural community with limited employment opportunities (do not want to become a dormitory settlement). Public transport links are minimal and this is unlikely to change. Capacity of the local primary school needs to be considered. -SO6: BUR004 will increase the need to travel. -SO8: Land suitable for agriculture would be lost, therefore the positive score is incorrect. -SO9 and 10: BUR004 is in an area of high flood risk (river Teme flood plain) and is regularly flooded. Flood risk may increase as a result of Tenbury Wells flood prevention schemes. The site would also not reduce flood risk/improve flood management. Therefore the positive score is incorrect. -SO13: BUR004 does not promote adaptation or mitigation of climate change and its development will negatively effect the surrounding area. Not aware of protected trees on the site, but development will have an effect on those on the sites northern boundary. -SO14: Development of BUR004 would further increase capacity to manage waste. -SO15: BUR004 is in an area of beauty looking down Teme valley SSSI. -SO16: BUR004 is in an area of high landscape sensitivity to locals and visitors. Development would effect this character - BUR002 and BUR004 would lead to development along the A456.
A0331	B003	Habitats Regulations Assessment	Habitats Regulations Assessment (BUR004)	Not Specified	No	Not Specified	Neither BUR002 or BUR004 are referenced within the Habitats Regulations Assessment (HRA). However their development could contaminate the River Teme, which runs to the River Severn. Wildlife and fauna on BUR004 should be assessed.
A0332	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005. Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside. Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0331	B001	Re-run the Regulation 19 consultation and notify the public through means other than computer (local media, leafleting, local radio etc), so they are aware of proposals and able to comment if they wish.	Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and Regulation 19 of the Town and Country Plan Act (TCPA).	No
A0331	B002	Remove site BUR004 from the draft Shropshire Local Plan.	The SA Scoping Report set out the proposed criteria for site evaluation. The Scoping Report was subject to consultation in the early stages of the Plan making process and amendments made as a result. As such, the Council considers the SA criteria for site evaluation to be appropriate and does not propose any change.	No
A0331	B003	Remove site BUR004 from the draft Shropshire Local Plan.	The HRA covers the River Severn, thus the impacts from development on site BUR004 has been assessed. No change proposed.	No
A0332	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0333	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	No	The proposed developments in Cressage will change the landscape of the village and have a negative effect on the infrastructure, and this has not been fully considered. The allocation of points for services in Cressage are biased in favour of the planners rather than the village. There has been a lack of feedback from the consultation so we are unaware of the facts as to why decisions have been made. We understand that there has not been a full count of the consultation responses due to a lack of resources at Shropshire Council
A0334	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	The HoS has not been applied in a proper manner in regard to Trefonen. It should not be a Hub - there are few job opportunities and virtually no public transport.
A0335	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and S14.2	Not Specified	No	Not Specified	Trefonen does not have significant employment opportunities or peak time public transport. It is the only proposed Community Hub with neither of these key requirements and this proposal does not tie-up with climate change and sustainability objectives. As such Trefonen should be in the other rural settlement category.
A0335	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	Definition of a Community Hub included a requirement for both significant employment and peak time public transport. Trefonen has neither of these meaning all Trefonen residents are dependent on the private car with associated implications for engine emissions and impact on access via narrow roads/lanes. Relaxation of these requirements works against proposed policy SP3 and sustainability objectives to minimise car travel and reduce carbon emissions (the Hierarchy of Settlements Assessment HoS, should align with these objectives).



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0333	B001	The Inspector should look at the village's facilities and infrastructure and realise that we cannot cope with large developments or take any more houses or people. Previous responses should also be looked at as they were ignored, including the Countryside Charities objections. They should also review the consultation process during covid-19 and the impacts this had on people replying	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.	No
A0334	B001	The HoS wording which suggests that lack of jobs and public transport could be balanced by a larger range of other services should be removed. Trefonen should be countryside.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment. <u>As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.</u>	No
A0335	B001	Trefonen should not be identified as a proposed Community Hub. It is only suitable for starter homes, intermediate/affordable housing for young families and bungalows for downsizing. Any development in the village should conform to the Village Design Statement and consider narrow roads and lanes in most of Trefonen.	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen. As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub. Shropshire Council also considers that the development strategy proposed for Trefonen, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable. It is noted that the proposed requirements in draft Policy S14.2, which applies to the proposed Community Hubs in the Oswestry Place Plan Area - including Trefonen, includes "development proposals will be expected to positively respond to policies and guidelines within any relevant community-led plans and local needs."	No
A0335	B002	The Hierarchy of Settlements Assessment (HoS) used to identify Community Hub's should be updated. Trefonen should not be identified as a proposed Community Hub.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment. <u>As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.</u>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0336	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0337	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13 (MUW012VAR)	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan is unsound as:</p> <ul style="list-style-type: none"> <li>-An unsuitable site (MUW012VAR) is proposed for allocation because it is believed this will address flooding issues on the adjacent Hunters Gate Estate. Yet this issue (present since development occurred) has not been addressed by the developer of Hunters Gate or Shropshire Council, despite other parts of the town receiving flood alleviation.</li> <li>-Legal commitments set out in the Statement of Community Involvement (SCI) relating to meaningful public engagement (no community meetings and ignoring community suggestions) have not been met.</li> <li>-The site selection process is flawed as it ignores alternative and potentially better sites - discussions have only ever occurred with a single landowner (scheme size increased to suit their commercial needs).</li> <li>-MUW012VAR a large development is proposed outside the development boundary and beyond walking distance to amenities (shopping, GP, library, schools etc), increasing reliance on cars, exacerbating existing issues (increased traffic (Gaskell Corner a particular pinch point) and rat running in narrow medieval streets) and with no solutions.</li> <li>-Housing and employment provision is not balanced in Much Wenlock, meaning it will become more of a dormitory town.</li> <li>-Proposal make a nonsense of Council zero-carbon aspirations and increase emission pollution in Much Wenlock - traffic associated with Much Wenlock, the Former Ironbridge Power Station and BRD030 in Bridgnorth.</li> <li>-There is no appreciation of the characteristics of Much Wenlock and proposals undermine them (medieval heritage and tourist destination).</li> <li>-Development will increase pressure on already overburdened services (GP, water supply and sewerage). No infrastructure improvements are proposed to support the 15% increase in the size of the town.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0336	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0337	B001	<p>Ensure flood risk is addressed before development is considered (a whole town solution is required for Much Wenlock).</p> <p>Ensure an infrastructure plan is prepared before site allocations proposed.</p> <p>Factor in impact of major development at the Former Ironbridge Power Station site when planning for Much Wenlock.</p>	<p>Shropshire Council also considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0337	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13 (MUW012VAR)	No	Not Specified	Not Specified	The draft Shropshire Local Plan is not legally compliant as: -It is contrary to the Localism Act/national policy as it is not consistent with the positive vision of sustainable growth in the Much Wenlock Neighbourhood Plan (and the views of the community it reflects). Rather it imposes an unsuitable and commercially drive solution. -Duty to manage flood risk in Much Wenlock (particularly Hunters Gate) have been ignored.
A0338	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0338	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0338	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0338	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0337	B002	Consult the Much Wenlock community if proposing changes to the Much Wenlock Neighbourhood Plan. Meet obligation to control flooding. Delete proposed allocation MUW012VAR.	The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement. Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.	No
A0338	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0338	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0338	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0338	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0338	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0339	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002/P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0339	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0339	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0338	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0339	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0339	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0339	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0340	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0340	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0340	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0340	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from ‘inappropriate development’. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is ‘inappropriate development’, unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating ‘very special circumstances’. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0341	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0340	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0340	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0340	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0340	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0341	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0341	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0341	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0341	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0341	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0342	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0341	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0341	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0341	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0341	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0342	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0342	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0342	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0342	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0342	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0343	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0342	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0342	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0342	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0342	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0343	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0343	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0343	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0343	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0343	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0343	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0343	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0343	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0343	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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A0344	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0344	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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A0345	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.49	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>
A0346	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2.2	Not Specified	No	Not Specified	<p>Para 5.41 of the Hierarchy of Settlements identifies the key criteria for 'Community Hub' status includes requiring:</p> <p>- "significant employment opportunities". Opportunities for employment in Trefonen are virtually non-existent and are therefore not significant.</p> <p>- "peak time public transport", this is not available in Trefonen.</p> <p>Trefonen is the only proposed Community Hub which fails to meet these criteria. Disagree that these can be offset by virtue of a playground and green space (para 5.41) is incorrect. As such consider Trefonen Community Hub status is unsound (should be identified as countryside) and this alone is sufficient to judge the draft Shropshire Local Plan unsound.</p> <p>Lack of significant employment in the vicinity of new housing means occupant will need to commute (probably significant distances) with consequent damage to the environment and congestion. Trefonen's status as a proposed Community Hub is therefore contrary to draft Policy SP3 and Sustainability Appraisal objectives SO5, SO6 and SO12.</p>
A0347	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP8	No	No	Not Specified	<p>1. The Local Authority should ensure that it has fully taken into account the availability of water in new developments, particularly in areas of water stress (Shropshire is moving towards serious water stress).</p> <p>2. There is the need for appropriate foul drainage arrangement, to avoid extensive proliferation of non-mains drainage. Suggest reference to DP19 should be included to make it more effective.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0345	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No
A0346	B001	Trefonen should not be identified as a Community Hub, rather it should be classified as countryside (associated changes to the draft Shropshire Local Plan should be undertaken).	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen.</p> <p>As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.</p> <p>Shropshire Council also considers that the development strategy proposed for Trefonen, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p>	No
A0347	B001	n/a	<p>1.No Traveller site allocations are proposed in the Draft Plan. The Shropshire Water Cycle Study shows that there is sufficient water to accommodate the growth in the Local Plan and Policy DP20 sets out water efficiency standards for new housing and major development. No change proposed.</p> <p>2. The Plan should be read as a whole. SC do not consider that a cross reference is necessary here.</p>	Yes

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0347	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP19	No	No	Not Specified	<p>Suggested amendments to make the policy more effective</p> <ol style="list-style-type: none"> <li>1. Para 6: Proposals should help to conserve and enhance existing watercourses and riverside habitats in line with Policy DP12 wherever possible. Management, mitigation and compensation measures will be included should aim to improve water quality and create or enhance riverine and aquatic habitats</li> <li>2. Point 1 should be amended to say “maintain” or to meet good status.</li> <li>3. Point 2b should be revised to: “Prevented hazardous substances from entering groundwater and limit non-hazardous pollutants from entering groundwater.” This applies to all groundwater, not just within SPZ1 / SPZ’s.</li> <li>4. Within Shropshire there are many people who rely on private water supply wells, boreholes and springs for their potable water. Proposals in rural settings not served by mains foul drainage must consider the issue of appropriate foul drainage provision. Private potable groundwater should be considered as part of the planning process – such might be apparent through a water features survey and you might seek a default ‘50m radius’ from any such supply to ensure this potential risk is covered.</li> <li>5. Paragraph 3. We agree as there are certain development proposals (uses or design aspects) within a SPZ1, or the protection zone of a private potable groundwater supply, which will result in an ‘Objection in Principle’ from us. We suggest you could add ‘Development within SPZ2 and 3 will only be permitted where an appropriate risk assessment is provided’.</li> <li>6. Paragraph 4. Notwithstanding the commitment to high levels of water efficiency in new development, the Local Authority should ensure that it has fully taken into account the availability of water for new developments, particularly in areas of water stress.</li> <li>7. Paragraph 5c: Non mains drainage should assess water quality impacts.</li> <li>8. Paragraph 7: (re river restoration...) move to flood risk section (doesn’t really sit with water resource/quality).</li> </ol>
A0347	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP20	No	No	Not Specified	<ol style="list-style-type: none"> <li>1. Support.</li> <li>2. Update: we published our consultation on the updated method and initial outcomes for determining areas of ‘water stress’ in England on 11 February 2021. The final assessment will provide the Environment Agency’s advice to the Secretary of State on the water company areas that should be determined to be in areas of serious water stress.</li> <li>3. Note: Shropshire is showing as an area of water stress.</li> </ol>
A0347	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP21	No	No	Not Specified	<p>Suggestions to make the policy sound and more effective</p> <ol style="list-style-type: none"> <li>1. The policy is quite long and seems to duplicate some parts of the NPPF and NPPG guidance.</li> <li>2. Paragraph 7: We previously advised to focus on specific local Shropshire flood risk requirements linked to the SFRA e.g. flood risk reduction and betterment for ‘all’ proposals in flood zone 3 ‘including climate change’ (rather than just those subject to the Exception Test).</li> <li>3. Flood risk reduction and betterment opportunities should be sought for all proposals in flood zone 3 (including climate change) not just part 10 of the policy... but specifically...In those catchments where the cumulative effect of development is likely to have the greatest impact on flood risk, (as set out in the SFRA Level 2)</li> <li>4. Paragraph 2: This part is confusing - 2. The Sequential Test is not needed for; a) Development on land allocated in this plan unless the use of the site (is a greater vulnerability that that allocated) or is not in accordance with the use specified in this Plan.</li> <li>5. Paragraph 4.191: The sequential approach is still necessary at FRA level e.g. specific proposals on site to guide development to the best, lowest risk areas and to avoid flood risk.</li> <li>6. Paragraph 4.194. New climate change figures for peak river flow are coming out and we will provide an update in due course. Maybe include a line at the end of this paragraph to refer to future EA updates.</li> <li>7. Paragraph 4.195. A separate (FRAP) permit or (LA permit) may be required.</li> <li>8. Paragraph 10 of the policy. We would welcome an inclusion to say that all development provides flood risk contributions to help bring forward new or existing flood defence improvement schemes.</li> <li>9. Introductory sentence to policy. The recognised flood risk policy hierarchy is to appraise, manage and reduce flood risk approach. This is normally looked at in terms of ‘assess’ – avoid, substitute (Sequential Test or Sequential Approach/Alternative uses), then control measures and mitigation (as a final option). Presumably by minimise flood risk in the first instance you mean avoid? And managing residual risk are those risks that remain after the usual appropriate design control mitigation has been fully considered/incorporated.</li> <li>10. Para 4.188. SFRA also considered/ included a level of ‘climate change allowance’ – appropriate ‘at that time’ (in line with government guidance) note to new emerging update to peak river flows (fluvial).</li> <li>11. Para 4.193. Suggested amendments in bold. This policy sets out when a site-specific Flood Risk Assessment (FRA) is needed to inform a planning proposal. In considering the safety of the development, the FRA must demonstrate the occupants of any new dwellings will have access to an area of “dry ground above the 1% river flood level plus climate change” or safe refuge.</li> <li>12. Where prior evacuation is the safest option, the refuge should be an area outside of 1% annual exceedance probability with climate change flood event from all sources. Where prior evacuation is not preferred, internal safe refuge must be provided at an appropriate level above the 1% with climate change, with appropriate freeboard, flood level. The FRA should provide an evidence base for the Council to determine which option is the safest for that particular proposal. This should include: FRA should demonstrate that the development has safe, pedestrian access above the 1% river flood level plus climate change. Pedestrian access should preferably remain flood free in a 1% river flood event plus climate change. However, in cases where this may not be achievable, the FRA may demonstrate that pedestrian access is acceptable based on an appropriate assessment of ‘hazard risk’ including water depth, velocity and distance to higher ground (above the 1% river flood level plus climate change). Reference should be made to DEFRA Hazard risk (FD2320) – ‘Danger to People for Combinations of Depth &amp; Velocity’ (see Table 13.1 – DEFRA/EA Flood Risk Assessment Guidance for New Development FD2320 at: <a href="http://evidence.environment-agency.gov.uk/FCERM/Libraries/FCERM_Project_Documents/FD2320_3364_TRP_pdf.sflb.ashx">http://evidence.environment-agency.gov.uk/FCERM/Libraries/FCERM_Project_Documents/FD2320_3364_TRP_pdf.sflb.ashx</a></li> </ol>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0347	B002	n/a	<p>1. Amendment not accepted. This part of policy DP19 seeks to encourage the conservation and enhancement of existing watercourses. This amendment would impose an unjustified requirement. No change proposed.</p> <p>2. Amendment accepted, and minor modification proposed.</p> <p>3. Amendment not accepted. Any discharge of pollutants which enter groundwater directly, or may enter into the soil and reach groundwater, is a groundwater activity. Such an activity requires an environmental permit which is administered by the Environment Agency. The planning system should not duplicate other regulatory regimes. No change proposed.</p> <p>4. The Council recognises the importance of protecting private potable water supplies and a minor modification to paragraph 4.178 is proposed.</p> <p>5. No change proposed. Any discharge of pollutants which enter groundwater directly, or may enter into the soil and reach groundwater, is a groundwater activity. Such an activity requires a risk assessment as part of an application for an environmental permit administered by the Environment Agency. Adding a requirement for a risk assessment to this policy for SP22 and 3 would duplicate an existing pollution control regime. Additionally, compliance with such regimes is required by Policy DP18. No change proposed.</p> <p>6. Noted. The Shropshire Water Cycle Study demonstrates that there is sufficient water available to support the levels of growth proposed in the Local Plan. No change proposed.</p> <p>7. Noted. The Policy specifically covers non-mains drainage in point 5c. No change proposed.</p> <p>8. Amendment not accepted. This paragraph also covers asset renewal which does fit with the remainder of the policy. No change proposed.</p>	Yes
A0347	B003	n/a	<p>1. Support welcomed.</p> <p>2. Noted. No change proposed.</p> <p>3. Noted. No change proposed.</p>	No
A0347	B004	n/a	<p>1. No change proposed. The policy is designed to synthesise national policy and guidance to provide clarity for all those involved in the Development Management process.</p> <p>2. Minor modification for clarity to Para 7 of policy proposed</p> <p>3. Noted. Minor modification in point 2 above addresses this point. No change proposed.</p> <p>4. Text omitted in error so minor modification proposed to paragraph 2a</p> <p>5. Agree that parts of a site at lowest risk of flooding should be preferred. Minor modification to paragraph 4.191 proposed.</p> <p>6. Agree that future updates to climate change allowances should be considered in the planning process. Propose minor modification to para 4.194.</p> <p>7. Noted. No change proposed.</p> <p>8. Paragraph 56 of the National Planning Policy Framework (NPPF) states "Planning obligations must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development". It is considered that the requirements of draft Policy DP21 are consistent with the requirements of the NPPF (including paragraph 56), having been informed by the NPPF itself, the Strategic Flood Risk Assessment (SFRA) undertaken to inform the draft Shropshire Local Plan, any Flood Risk Assessments (FRA) necessary for specific development proposals and any other relevant information. It is not considered that a requirement for all development (irrespective of its location and the conclusions within available evidence) to make contributions toward flood warning services or new/existing flood defence maintenance is appropriate, nor is it considered to comply with paragraph 56 of the NPPF.9. Noted. The phrase, 'minimise flood risk' is intended to include avoidance through the sequential approach whilst recognising that it isn't always possible to completely eliminate all risk of flooding. This is consistent with national policy which requires a sequential approach followed by an exception test. Confirm that managing residual risk is as the representation suggests.</p> <p>10. Noted. No change proposed.</p> <p>11 and 12. Minor modifications to paragraph 4.193 proposed:</p>	Yes

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0347	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP25	No	No	Not Specified	Where Section 106 is necessary your 4.227 of Policy DP25 suggests that "It is expected this is only likely to be necessary on larger proposals of over 50 dwellings". However a flood risk contribution (as we have done in the past for sites reliant upon/benefitting from defence and/or flood warning e.g. in Coleham, Shrewsbury for example) may be necessary and relevant to 'any' residential scheme.
A0347	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP22	No	No	Not Specified	<p>1. We consider any infiltration Sustainable Drainage System (SuDS) greater than 2.0 m below ground level to be a deep system and are generally not acceptable. All infiltration SuDS require a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. All need to meet the criteria in our approach to managing and protecting groundwater: <a href="https://www.gov.uk/government/publications/groundwater-protection-position-statements">https://www.gov.uk/government/publications/groundwater-protection-position-statements</a>. In addition, they must not be constructed in ground affected by contamination. Also SuDS attenuation basins should normally be located outside of the 1% annual probability fluvial, with climate change, floodplain to avoid operational issues. (e.g. from the system flooding out during a flood event).</p> <p>2. Paragraph 6. This could say 'The appropriate climate change allowances 'for peak rainfall' should...</p> <p>3. It may be worth a line on rural SuDS and sedimentation control here. For guidance on Water Storage Reservoirs and Rural SuDS to help meet Water Framework Directive objectives please see <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291508/scho0612buwh-e-e.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291508/scho0612buwh-e-e.pdf</a> and <a href="http://www.ukia.org/">http://www.ukia.org/</a></p>
A0347	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP26	No	No	Not Specified	<p>1. Paragraph 2, point i – suggestions to make policy more effective. Hydropower applications should pay attention to fish stocks, "migratory fish impact", and normally be accompanied by a Flood Risk Assessment (see also Policy DP21); "a Water Framework Directive (WFD) Assessment and Geomorphological assessment". Hydropower schemes typically alter flow regimes, sediment movement and can impact geomorphological processes and habitats, and thus affect fish, macrophyte and invertebrate populations.</p> <p>2. Paragraph 2, point j - suggestions to make policy more effective. Maybe include impact on noise/vibration, air quality emissions, odour and dust/bio-aerosols...</p>
A0347	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP31	No	No	Not Specified	<p>1. Paragraph 1 point e. Mineral quarrying can cause adverse impacts to the water environment. A detailed and comprehensive water features survey should be undertaken for all sites. Additionally, detailed conceptual modelling of site specific geological and hydrogeological information over the course of a least one year will be needed to inform a comprehensive hydrogeological risk assessment. These requirements should be included in this part of the policy.</p> <p>2. Paragraph 2. Restoration of sites may be constrained by the need to protect water resources.</p> <p>3. General. Restoration with some materials may require an environmental permit. The permitting regime is independent of the planning system and we encourage applicants to dual-track the planning consent and permitting processes.</p> <p>4. General. We would support opportunities for habitat creation to benefit white-clawed crayfish at Gonsal. Also, where appropriate, multi-functional flood storage. The policy could expand on this latter point.</p>
A0347	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP32	No	No	Not Specified	<p>1. Paragraph 1. Suggest amendment as follows Further to Policy SP17, the development of waste transfer, recycling and recovery facilities will be supported where applicants can demonstrate that potential adverse impacts on the local community and Shropshire's natural and historic environment can be satisfactorily avoided and subsequently controlled and managed. Particular consideration will be given (where relevant) to:</p> <p>2. Paragraph 2 a. Maybe include odour, dust and bio-aerosols.</p> <p>3. General. The policy could also include the following text. We would encourage the parallel (twin) tracking of an Environmental Permit application with the planning application to provide a greater degree of certainty (on the land use planning impacts and pollution control measures)."</p> <p>4 Explanatory text. Could include: "Where developments are subject to an Environmental Permit from the Environment Agency, the EA would encourage pre-application discussions. These applications should provide an appropriate level of detail to inform a reasonable degree of certainty on the planning application and to ensure the principle of the development and use of the land is acceptable with cross reference to permitting constraints".</p>
A0347	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP17	No	No	Not Specified	Explanatory text. Could include; Where developments are subject to an Environmental Permit from the Environment Agency, the EA would encourage pre-application discussions. These applications should provide an appropriate level of detail to inform a reasonable degree of certainty on the planning application and to ensure the principle of the development and use of the land is acceptable with cross reference to permitting constraints".
A0347	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP33	No	No	Not Specified	<p>1. Paragraph 2. Landfill/Landraising sites should be located appropriately with reference to relevant documents and policies e.g. (<a href="https://www.gov.uk/government/publications/groundwater-protection-position-statements">https://www.gov.uk/government/publications/groundwater-protection-position-statements</a> and <a href="https://www.gov.uk/guidance/landfill-operators-environmental-permits/plan-the-environmental-setting-of-your-site">https://www.gov.uk/guidance/landfill-operators-environmental-permits/plan-the-environmental-setting-of-your-site</a>). Cross reference to DP19 should be made.</p> <p>2. General. EA normally objects to any proposed landfill site in SP21 and does not encourage such in any nominal SPZ for unregulated SPZ supplies. A detailed risk assessment to look at the nature, quantity, impacts and the water table is needed.</p> <p>3. General. Parallel tracking is recommended. The hydrogeological risk assessment submitted with a landfill permit application can be used to determine how EA position statement E1 applies to the planning application. Sites below the water table in sensitive groundwater settings should be refused.</p>
A0347	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	No	No	Not Specified	<p>1. Paragraph 1c. Could say "addresses the effects of", "avoids" and mitigates the impacts of climate change...</p> <p>2. We note the references to the Big Town Plan (BTP) in SP1...and similar in Policy SP2, with lines such as "...support of the delivery of the Big Town Plan and its related masterplans". Some sites in the BTP are in the functional flood plain and we do not want the inclusion of the BTP as an evidence base document to infer that such sites have any statutory status.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0347	B005	n/a	Policy DP25 identifies the proposed approach to securing any infrastructure necessary to support development. Given this proposed approach it is considered likely that S106 Planning Obligations will, in most instances, only be associated with developments of 50 or more dwellings. Minor modification proposed to Policy DP25 explanation paragraph 4.227 to clarify circumstances for section 106.	Yes
A0347	B006	n/a	1. and 3. Technical details on the design of SuDS, whether urban or rural is covered in the Shropshire Council's Surface Water Management: Interim Guidance for Developers, Shropshire Council's SuDS Handbook (upcoming) and/or the Construction Industry Research and Information Association (CIRIA) SuDS Manual. Paragraph 1 of Policy DP22 requires all major development to be in accordance with these documents. No change proposed 2. Minor modifications to DP22 paragraph 6 proposed.	Yes
A0347	B007	n/a	1. Amendment to part (i) of policy accepted and minor modification proposed. 2. Assessments for noise and air quality emissions are covered by Policy DP18 and so do not need to be specified in this policy. Minor modification to part (j) of policy to cover bio-aerosols proposed	Yes
A0347	B008	n/a	The detailed changes requested to para 1e of draft Policy DP31 are already addressed in para 4.272 of the proposed explanation to this draft Policy. Para 4.274 of the proposed explanation to draft Policy DP31 recognises the need for environmentally sensitive design and site restoration proposals. It is considered that site-specific proposals/opportunities would be more appropriately addressed as part of the Planning Application process for these sites. As such, no changes are proposed.	No
A0347	B009	n/a	With regard to proposed amendments to para 1 of draft Policy DP32, it is considered unlikely that all potential adverse impacts can be avoided. Such a requirement would be inconsistent with national policy for waste and would impose an unreasonable constraint on this type of essential business and community infrastructure in circumstances where impacts can be satisfactorily controlled. As such, no change is proposed. With regard to para 2a of draft Policy DP32, it is acknowledged that this is a useful clarification as such an appropriate minor modification is proposed. With regard to paras 3 and 4 of draft Policy DP32, it is acknowledged that promoting opportunities for twin-tracking of an Environmental Permit application and Planning Application for a site would provide a greater degree of certainty to the applicant, although this is not a policy consideration. As such an appropriate minor modification is proposed to the explanation paragraph 4.280 of draft Policy DP32.	Yes
A0347	B010	n/a	Noted. It is considered that this issue is more appropriately addressed within the explanation to draft Policy DP32, to which a minor modification is proposed.	No
A0347	B011	n/a	It is considered that para 2a of draft Policy DP33 provides appropriate reference to the need for compliance with water management and water resource protection policy requirements. Furthermore the draft Shropshire Local Plan should be read as a whole and draft Policy DP19 specifically addresses water resources and water quality. For clarity a minor modification is proposed to cross reference draft Policy DP19 within para 2a of draft Policy DP33. The need to consider opportunities for parallel tracking is recognised. This is proposed to be addressed through a minor modification to para 4.280 of the explanation to draft Policy DP32.	Yes
A0347	B012	n/a	Noted. Shropshire Council considers the proposed wording of draft Policy SP1 is appropriate. The draft Shropshire Local Plan should be read as a whole. Whilst it presents an opportunity to ensure a comprehensive and co-ordinated approach is pursued to the planning and development of Shrewsbury and to ensure development is consistent with the objectives of the Shrewsbury Big Town Plan and associated masterplan documents which are material considerations in decision making, other proposed policies, such as DP21 which relates to flood risk, remain relevant to all development proposals across Shropshire.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0347	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	No	No	Not Specified	We note the references to the Big Town Plan (BTP) in SP1...and similar in Policy SP2, with lines such as "...support of the delivery of the Big Town Plan and its related masterplans". Some sites in the BTP are in the functional flood plain and we do not want the inclusion of the BTP as an evidence base document to infer that such sites have any statutory status.
A0347	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 Shrewsbury	No	No	Not Specified	<p>1. Explanatory text; The Shrewsbury Big Town Plan (BTP) is referenced as a significant material consideration. We would not want the LPR to infer that any sites identified in the BTP have the same weight as those allocated in the documents such as an SPD, Neighbourhood Plan etc which have been through a statutory consultation process. We did discuss this issue with you as part of earlier evidence base conversations. It might be reasonable for the policy to have regard to a potential design steer from the BTP instead. Care should be taken to ensure viability and not to show inaccurate details or significant elements that haven't been decided upon. We will treat development opportunities within Shrewsbury as windfall development and as part of any future strategic planning consultation we formally receive. Such documents should be supported by appropriate evidence.</p> <p>2. Paragraph 7. The line of the NWRR is included in the Plan and we read this as an indicative route only. We have flagged environmental issues and concerns as part of EIA scoping and have outlined the need to consider and be transparent on potential alternative routes/design for the road to avoid impacts on water resources and environmental issues. We have also previously expressed reservations about potential allocations/infill sites in the Shelton area, between the line of the road and the development boundary and we now strongly object to any such development sites, in line with our previous comments. We support the removal of that potential allocation.</p> <p>3. Paragraph 10 c. Our preference is for avoidance of inappropriate development within the floodplain.</p> <p>4. Paragraph 12 b. This should include water abstraction areas', as a key environmental consideration to avoid inappropriate development and impact upon.</p>
A0347	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	No	No	Not Specified	<p>1. Paragraph 4. Should include "by avoiding inappropriate development in fluvial flood risk areas".</p> <p>2. General. Your plan appears centred around increasing growth and economic productivity...in line with our strategic climate change objectives and move towards net zero carbon, your Council's declaration and SA objective, we would encourage you to ensure all growth and related transport options are sustainable in the long term with emphasis on addressing the effects of climate change too.</p> <p>3. Paragraph 4 d. Support. Integrating water efficiency measures to mitigate the impact of drought and reduce resource and associated energy consumption. Whether it needs to link to policy DP20; and/or refer to the expected higher levels of water efficiency standards here? (Noting future likely 'serious water stress' in Shropshire) – see DP20 comments.</p>
A0347	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	No	No	Not Specified	Paragraph 1 h. In line with our comments made to the Water Cycle Study and waste water infrastructure there are capacity issues associated with some areas – a lack of mitigation options to show if and how some impacts can be overcome (deliverability). This should be informed by your evidence base to identify and ensure any infrastructure requirements are deliverable.
A0347	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	No	No	Not Specified	<p>1. The rural nature of Community Clusters means that early consideration should be given to the availability of water in new developments (particularly in areas of water stress), adjacent private water supplies and non-mains foul drainage.</p> <p>2. The issue of appropriate foul drainage provision is particularly important in such settings. Within Shropshire there are many people who rely on private water supply wells, boreholes and springs for their potable water. We wouldn't encourage the extensive proliferation of non-mains drainage. Large scale development that is not able to be serviced by mains water or mains foul drainage could potentially have negative environmental impacts for water resource and water quality.</p> <p>3. Reference to DP19 should be included.</p> <p>4. There may be options for 'first time' mains sewerage systems.</p>
A0347	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP16	No	No	Not Specified	Ensuring appropriate restoration measures are key in terms of protecting water resources. Restoration with soils will require a waste exemption or may require an appropriate environmental permit. Dual-tracking of the planning and permitting process for mineral sites, with waste recovery/landfilling, is advisable (See <a href="https://www.gov.uk/guidance/waste-recovery-plans-and-permits">https://www.gov.uk/guidance/waste-recovery-plans-and-permits</a> ).
A0347	B019	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Strategic Flood Risk Assessments (SFRA) Levels 1 and 2	No	No	Not Specified	<p>1. We note the SFRA is intended to help Shropshire Council in applying the Sequential Test for their site allocations and identify where the application of the Exception Test may be required via a Level 2 Strategic Flood Risk Assessment.</p> <p>2. We haven't reviewed all sites as part of our review of this plan or SFRA L2. We rely on sites that may come forward being sequentially tested etc by you, as the LPA and appropriately assessed to ensure sustainability, including all sources of flooding.</p> <p>3. Rep summarises the modelling used in the SFRA to assess flood risk.</p> <p>4. The SFRA-2 table shows that the degree of flood risk varies between sites with some sites being more affected than others but the SFRA concludes that all sites in the summary table (6.1) should be developable to some degree if the detailed advice in the SFRA is followed.</p> <p>5. The SFRA assumes the maximum extent of fluvial flooding with climate change is likely to be similar to Flood Zone 2. EA normally require the 100-year plus 35% and 100-year plus 70% climate change fluvial scenarios to be considered in future housing developments (more vulnerable). These will likely be updated this year.</p> <p>6. The SFRA suggests that developers may need to undertake more detailed hydrological and hydraulic assessments of watercourses where there are currently no detailed hydraulic models, to verify flood extent (including latest climate change allowances), inform development zoning within the site and prove, if required, whether the Exception Test can be passed. This should be carried forward into the relevant site guidelines and for some sites, it will also need to include smaller un-modelled 'ordinary' watercourses (with a catchment less than 1km2. The outcome of such modelling may affect the amount of developable area and safe development requirements as well as the need for blue infrastructure.</p> <p>7. SFRA-2 section 8.2.2. This should also refer to the restrictions for surface water discharges to ground within SP71.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0347	B013	n/a	Noted. Shropshire Council considers the proposed wording of draft Policy SP1 is appropriate. The draft Shropshire Local Plan should be read as a whole. Whilst it presents an opportunity to ensure a comprehensive and co-ordinated approach is pursued to the planning and development of Shrewsbury and to ensure development is consistent with the objectives of the Shrewsbury Big Town Plan and associated masterplan documents which are material considerations in decision making, other proposed policies, such as DP21 which relates to flood risk, remain relevant to all development proposals across Shropshire.	No
A0347	B014	n/a	<p>1. The Shrewsbury Big Town Plan is a visionary urban design document which has established a compelling and challenging shared vision and development framework for the town. It is considered appropriate to identify the objectives of the Big Town Plan and its associated masterplan documents as material considerations in decision making as they underpin the proposed strategy for Shrewsbury. We would note that the draft Shropshire Local Plan, if adopted, would represent the starting point for decision making in accordance with Planning law, but that the specific proposals within or resulting from the Big Town Plan would be material in decision making.</p> <p>2. Support for the removal of site SHR216 is noted.</p> <p>3. The Plan should be read as a whole. Policy DP21 follows national policy and guidance on minimising flood risk. No change proposed.</p> <p>4. The Plan should be read as a whole. Policy DP19 safeguards groundwater Source Protection Zones. No change proposed.</p>	No
A0347	B015	n/a	<p>1. Minor modification proposed to accommodate the point being made</p> <p>2. Noted. No change proposed. The Local Plan sets out the Council's strategy for the delivery of the objectively assessed housing need and employment requirement. It has been subject to Sustainability Appraisal which assesses policies and site allocations against a range of sustainability objectives, including those designed to minimise, mitigate and adapt to climate change.</p> <p>3. Support welcomed. Amendment to cross refer to Policy DP20 proposed</p>	Yes
A0347	B016	n/a	Noted. No change proposed. The Statements of Common Ground with Severn Trent Water and Welsh Water show how the capacity issues identified in the Water Cycle Study can be overcome.	No
A0347	B017	n/a	<p>1. The Shropshire Water Cycle Study shows that there is sufficient water to accommodate the growth in the Local Plan, including in the rural areas. No change proposed.</p> <p>2. Proposed modifications to Policy DP19 address the issue of private water supplies and non-mains drainage. No change proposed.</p> <p>3. The draft Shropshire Local Plan should be read as a whole. Furthermore, draft Policy SP9 includes "There is sufficient infrastructure capacity to support the development, or any infrastructure capacity constraints can be addressed through the development, consistent with relevant policies of this Local Plan." Given the number of relevant policies, it is not considered that specific cross-referencing is necessary in this instance.</p> <p>4. Options for first time mains sewerage systems are noted. No change proposed.</p>	No
A0347	B018	n/a	Noted. The draft Shropshire Local Plan should be read as a whole. Para 4.274 of the explanation to draft Policy DP31 already recognises the need for environmentally sensitive design and site restoration proposals. It is also considered that the minor modification proposed to para 4.280 of the explanation to draft Policy DP32 addresses opportunities for twin-tracking with waste permitting.	No
A0347	B019	n/a	<p>1. Noted. No change proposed.</p> <p>2. Noted. No change proposed.</p> <p>3. Noted. No change proposed.</p> <p>4. Noted. No change proposed.</p> <p>5. Noted. No change proposed.</p> <p>6. The SFRA-2 evaluated 98 proposed allocations/promoted sites for fluvial flood risk, including flood risk from unmodelled water course. Out of the 98 sites, 19 were carried forward to a Level 2 assessment. Two of these sites, CST021 and WEM033, were taken forward on the basis that they contained unmodelled water courses. The Council thus considers that the flood risk from unmodelled watercourse has been adequately considered for all allocated sites and there is no need to add a requirement for more detailed hydrological and hydraulic assessments of the watercourses to any site guidelines. No change proposed.</p> <p>7. The SFRA is an evidence base document and as such has informed the preparation of the Local Plan. The amendment suggested would not affect the content of the Local Plan so no change is proposed</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0347	B020	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Water Cycle Study	No	No	Not Specified	Evidence base WCS: Infrastructure The WCS/Local Plan is not clear on solutions for wastewater infrastructure in areas with a capacity issue. For instance, the WCS mentions that 'pumping out of catchment' may be needed, but this needs to be examined to inform likely viability, cost, delivery etc. We have indicated in previous discussions with you that you need to demonstrate there is a solution to amber or red constraints identified in the WCS. You may need to produce an Infrastructure Delivery Plan to give a reasonable degree of certainty and demonstrate that development is deliverable and will not cause environmental degradation. Government guidance states that sufficient detail should be provided to give clarity to all parties on if/when infrastructure upgrades will be provided, looking at the needs and costs (what and how much). There may be a need for a phasing policy to allow time for the solution to be actioned.
A0347	B021	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: WCS	No	No	Not Specified	Evidence base WCS: Section 9.7: Comment is made in numerous parts of the study to '...further mitigation may need to be taken to accommodate growth and options include pumping wastewater to a different WwTW or changing the point of discharge to a less sensitive waterbody'. This is not as easy as it may seem and the study does not pick up on the issue that transferring flow out of a catchment can cause more environmental harm as a result of the loss of flow from the original watercourse and then the need for assessment at any new location. We haven't listed all relevant sites here but further work is required to address this.
A0347	B022	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Water Cycle Study	No	No	Not Specified	Evidence base WCS: Section 6.3 Methodology With reference to the following point '...a red RAG score given by the water companies reflects the presence of sewer flooding, CSO spills or pollution events in the vicinity of the site, on the assumption that an increase in wastewater flows from development would make those occurrences more likely in the future...' We consider that impacts of the growth could be seen some distance from the development site depending upon the location of the first impacted storm overflow or even a cumulative effect in the sewer network. We are a bit concerned that just the immediate vicinity has been screened.
A0347	B023	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Water Cycle Study	No	No	Not Specified	Evidence base WCS: Section 6.6.1 The following comment has been made with regards to the Strategic Sites 'All of the strategic sites were scored red by STW who gave the following comments for each of the sites: Consider on-site treatment system. In reality this is probably more difficult than it may seem as any new discharge from an on-site treatment system would need to be assessed in terms of strict no deterioration policy as opposed to river needs permitting.
A0347	B024	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Water Cycle Study	No	No	Not Specified	Evidence base WCS: Table 7.2 Summary of WwTW flow assessment - could benefit from a column showing the proposed growth for easy comparison with the perceived headroom capacity.
A0347	B025	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Water Cycle Study	No	No	Not Specified	Evidence base WCS: Section 9.1 Phosphates – there doesn't appear to be any reference to the fact that a large percentage of phosphate in the sewer network originates from phosphate dosing into water supply to prevent leaching from water supply pipes.
A0347	B026	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Water Cycle Study	No	No	Not Specified	Evidence base WCS: Figure 9.1 Is the wording in light green outcome box correct? Shouldn't it read 'GES can be achieved using current technology?'
A0347	B027	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Water Cycle Study	No	No	Not Specified	Evidence base WCS: Section 9.4 Possible typo: SIMCAT modelling approach – Run type 9 within SIMCAT was then used which assumes that upstream flow each treatment works is at good ecological status. The permit value required to achieve GES is then calculated by the model.
A0347	B028	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Water Cycle Study	No	No	Not Specified	Evidence base WCS: Table 9.2 We suspect that WFD Standards do exist for the following: Bishop's Castle – Snakescroft Brook (GB 109054044061): Chirbury Tributary – source to confluence with River Camlad (GB 109054049290): Ditton Priors – Rea -source to confluence with Farlow Brook (GB109054044281): Dorrington- Cound Brook – confluence unnamed tributary to conf unnamed tributary (GB 109054049400): Ellesmere Wharf Meadon – Tetchill Brook – source to confluence with River Perry (GB 109054055000): Prees Golfhouse Lane-Soulton Brook- source to confluence with River Roden (GB 109054049201): Rushbury -Byne Brook – source to confluence with Quinny Brook (GB 109054044370). The WCS should be updated and appropriate actions taken.
A0347	B029	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Water Cycle Study	No	No	Not Specified	Evidence base WCS: Section 11.3 Point source pollution. It doesn't appear that the relevance of the SSSI designation or whether it is in continuity with the watercourse has been considered.
A0347	B030	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Water Cycle Study	No	No	Not Specified	Evidence base WCS: Section 11.7.1 This section doesn't appear to recognise the benefits SUDS offer in terms of reduced flows in combined sewers and so the potential reduction in storm impacts via CSOs and storm storage overflows

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0347	B020	n/a	The Statements of Common Ground between SC and Severn Trent Water and SC and Welsh Water demonstrate that the red and amber constraints for wastewater infrastructure shown in the WCS can be overcome. Additionally, Policy DP19 provides for phasing to allow the relevant water company sufficient time to undertake any necessary capacity improvement works to the waste-water treatment works prior to construction and occupation of the development. No change proposed.	No
A0347	B021	n/a	Solutions for those WwTW which are at their Technically Achievable Limit (TAL) will be determined by the relevant water company at the development management stage rather than the plan making stage and will be subject to the environmental permitting regime at this point. No change proposed.	No
A0347	B022	n/a	Noted. No change proposed.	No
A0347	B023	n/a	Noted. No change proposed.	No
A0347	B024	n/a	Noted. No change proposed.	No
A0347	B025	n/a	Noted. No change proposed.	No
A0347	B026	n/a	The 2021 Erratum to the WCS corrects this table. No change proposed.	No
A0347	B027	n/a	The WCS is an evidence base document and as such has informed the preparation of the Local Plan. The amendment suggested would not affect the content of the Local Plan so no change is proposed.	No
A0347	B028	n/a	Table 9.2 is updated in the 2021 WCS Erratum as Table 9.1. Although some WwTW which previously did not have WFD standards do now have them in the updated version, there are some that still don't. However, the WCS states that the latter have still been assessed using a 10% deterioration test and based on this, no change to the WCS is proposed.	No
A0347	B029	n/a	The 2021 Addendum to the WCS presents a fuller assessment of the impact on designated wildlife sites which addresses this point. No change proposed.	No
A0347	B030	n/a	Noted. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0347	B031	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Water Cycle Study	No	No	Not Specified	Evidence base WCS: Section 12.3 The WCS states that 'the current allocated and committed growth in Shropshire has been made possible by upgrading phosphate stripping processes in the WwTW in the Clun catchment in order to reduce point-source inputs of nutrients, however any additional growth in the catchment would need further measures to ensure no deterioration to water quality in the catchment'. Our understanding was that 'projected future growth' was included in the requirements of the AMP6 schemes but this will not have accounted for any additional growth in this WCS, or local plan review, so yes, this additional growth alone would need further measures. These need to be understood and demonstrated to be deliverable.
A0347	B032	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Water Cycle Study	No	No	Not Specified	Evidence base WCS: Table 12.2 Options – Farm management – any nutrient removal via this route must be above and beyond what we would expect the agricultural sector to achieve in any case e.g. regulatory minimum.
A0347	B033	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence base: Water Cycle Study	No	No	Not Specified	Evidence base WCS Section 12.4.1 The WCS states that 'Additional growth as part of the preferred options and strategic sites identified in the Local Plan Review, would reduce the percentage phosphate load removed to under 75%. However, in AMP7 Bishops Castle is also due to be upgraded and its permit tightened to 0.4mg/l (from 0.43mg/l) to ensure future compliance. This is predicted to offset the proposed additional growth, and even allow some betterment in comparison to AMP6. Severn Trent Water have therefore commented that they would not need to "undertake further work to accommodate the extra 121 houses over and above the work already scheduled at Bishops Castle. This work alone is sufficient to ensure no net detriment to the SAC." This needs further clarity. Our understanding was that the initial growth projections were accounted for in the 75% load reduction but not the additional considered in this review. The AMP7 scheme at Bishops Castle is a No Deterioration scheme which assessed the possible impact if the STW discharged at the limit of its permit. Discharging at permitted load would cause a deterioration in the receiving watercourse so the P limit was tightened to ensure the load would not increase. Question is, are STWL suggesting that the current headroom at permitted volume would be sufficient to accommodate all the additional growth proposed for the Clun catchment? We would advise you to update the WCS and seek further clarification. To assist capacity considerations, in discussion with Severn Trent Water, you could check how much additional flow would be expected and where. We can then assess what further Phosphate reduction would be required to maintain the promised load reduction and how feasible that would be etc. Any identified action or option will need to come out as likely feasible, viable, and deliverable. This would also need to consider nutrient neutrality.
A0347	B034	Habitats Regulations Assessment	Habitats Regulations Assessment Severn Estuary SAC/SPA/Ramsar	No	No	Not Specified	HRA: Severn Estuary SAC/SPA/Ramsar 1. The estuary is designated for migratory fish and the HRA should consider impacts on water quality and water quantity for tributaries in Shropshire from increased recreational pressure and the potential for the introduction of aquatic diseases. 2. Section 3.13 uses a 20km drainage range. The use of the river by migratory fish means that this is not appropriate – it does not assess dependant habitat for the Severn Estuary SAC and Ramsar. 3. Section 3.2 does not include the Ramsar designation. 4. Section 3.5 does not include impacts from water quantity. Low flows from increased abstraction for development would exacerbate nutrient enrichment.
A0347	B035	Habitats Regulations Assessment	Habitats Regulations Assessment Hencott Pool Ramsar	No	No	Not Specified	HRA: Hencott Pool Ramsar Recreational impact has been screened out for Hencott Pool. Whilst there is no formal public access to Hencott Pool there is informal access. Increased residential housing in the area is highly likely to increase the amount of public usage of the site which could lead to water management impact; vegetation disturbance and destruction and the introduction of invasive plants.
A0347	B036	Habitats Regulations Assessment	Habitats Regulations Assessment Stage 2 Appropriate Assessment	No	No	Not Specified	HRA: Stage 2 Appropriate Assessment - invasive species Only sites with public access have been taken to Stage 2, but informal access is available around sites and if nearby residential numbers increase there is potential for impact, A mitigation measure of managing visitor numbers and access needs to be discussed in stage 2 for all of the sites
A0347	B037	Habitats Regulations Assessment	Habitats Regulations Assessment Air pollution	No	No	Not Specified	HRA: Air pollution The potential impacts of air pollution to the designated sites does not appear to have been discussed within the HRA such as from increased or closer road traffic and construction
A0347	B038	Habitats Regulations Assessment	Habitats Regulations Assessment Para 3.21	No	No	Not Specified	HRA: Paragraph 3.21 The conclusions of stage 2 assessment are that local plan sustainability policies DP20 to 23 will protect waterbodies from adverse effects. However a number of settlements have been scored as 'amber' or 'red' for water supply or wastewater infrastructure in the Shropshire Water Cycle Study meaning that significant infrastructure may be required to accommodate it. These settlements should be flagged as mitigation measures not yet agreed for the HRA assessment until further discussions and agreements have taken place between the water cycle study group and Severn Trent Water. There needs to be options presented to provide certainty and ensure deliverability.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0347	B031	n/a	Severn Trent Water have confirmed to SC that the additional proposed growth can be accommodated by the AMP7 (2020-2025) upgrades to Wastewater Treatment Works and that they therefore wouldn't undertake any further work over and above the work already scheduled at Bishops Castle. See also the Statement of Common Ground with Severn Trent Water.	No
A0347	B032	n/a	Noted. No change proposed.	No
A0347	B033	n/a	Severn Trent Water have confirmed to SC that the current permit has sufficient headroom to accommodate all the additional growth proposed in the river Clun catchment.	No
A0347	B034	n/a	<p>1. Table 2 of the HRA (Hydrological potential effect pathways) identifies that the River Severn SAC/SPA/Ramsar is vulnerable to changes in water quality and quantity and this is discussed in more detail, and mitigation proposed in sections 3.2-3.22 of the HRA. This is considered to address issues pertaining to migratory fish. A minor modification is proposed to section 3.5 of the HRA to explicitly include reference to watercourses in the Plan area supporting migratory fish, which are features of the Severn Estuary SAC and Ramsar.</p> <p>2. The 2021 Addendum to the WCS presents a fuller assessment of the impact on designated wildlife sites and the application of policies DP19: Water Resources and Water Quality, DP20: Water Efficiency, DP21: Flood Risk and DP22: Sustainable Drainage will protect all watercourse (including those used by migratory fish) and in so doing are likely to prevent adverse effects on site integrity, alone and in combination, on the Severn Estuary SAC/SPA and Ramsar.</p> <p>3. Minor modification to HRA proposed to add in an overview of the Ramsar designation after section 3.4.</p> <p>4. Minor modification to HRA proposed to add in reference to water quantity being a key issue with potential to affect the Severn Estuary SAC/SPA/Ramsar.</p>	No
A0347	B035	n/a	There needs to be credible evidence of an impact pathway to a European site for it to be subject to screening for likely significant effects. Informal access is hypothetically possible to every European site and therefore criteria presented in section 2.55 are considered sufficiently robust to identify sites where there is real risk of recreational impact pathways being present. No change proposed.	No
A0347	B036	n/a	There needs to be credible evidence of an impact pathway to a European site for it to be subject to screening for likely significant effects. Informal access is hypothetically possible to every European site and therefore criteria presented in section 2.55 are considered sufficiently robust to identify sites where there is real risk of recreational impact pathways being present. No change proposed.	No
A0347	B037	n/a	Consideration of impacts from air pollution upon European sites is considered in the HRA in sections 2.12 - 2.41, Table 1, table 2 and Appendix 3 as well as for individual sites - Hencott Pool Ramsar (sections 3.96-3.104). No change proposed.	No
A0347	B038	n/a	The Statements of Common Ground between SC and Severn Trent Water and SC and Welsh Water demonstrate that the red and amber constraints for wastewater infrastructure shown in the WCS can be overcome. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0347	B039	Habitats Regulations Assessment	Habitats Regulations Assessment Section 3.23	No	No	Not Specified	HRA: Section 3.23 The paragraph fails to also consider the inter-dependency of the Pearl Mussels on Trout and Salmon to complete their lifecycle. These fish require good water quality and adequate water quantity. Unnatural volumes and frequency of flooding and drought which could also be exacerbated by development would also impact the Pearl Mussels and fish.
A0347	B040	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP14	No	No	Not Specified	Do not agree that development policy and settlement policy wording and the statutory requirement for a project level HRA for development (as outlined in the HRA) will prevent adverse effects on the integrity of the River Clun SAC. Measures to ensure that developments achieve nutrient neutrality cannot yet be calculated and therefore there is no guarantee that nutrient neutrality can be achieved for the scale of development in the Local Plan. Suggest that development is not allocated in the Clun catchment. There may be scope for windfall proposals to be assessed on an individual basis but there needs to be some discussion on that to ensure that mitigation has a reasonable prospect of delivery.
A0347	B041	Habitats Regulations Assessment	Habitats Regulations Assessment River Dee SAC	No	No	Not Specified	HRA: River Dee SAC Housing allocation within the River Dee catchment is relatively low and there is current or already planned upgrade capacity for wastewater and water resource infrastructure. Policy DP20-23 seems a reasonable mitigation option for HRAS2 assessment for the River Dee SAC.
A0347	B042	Habitats Regulations Assessment	Habitats Regulations Assessment Para 3.54	No	No	Not Specified	HRA Paragraph 3.54 - Montgomery Canal SAC 1. There are plans to restore and reconnect dry sections of the Montgomery Canal which require mitigation areas close to the canal for plants and animals from the canal. The Canal & River Trust should be consulted on; the HRA for the local plan allocations; pressure from increased recreational use of the canal; the requirement for individual developments to be subject to a full HRA; and adherence to DP13, 15, and 16. 2. Suggest the introduction of invasive plants and animal disease also needs to be added to this section.
A0347	B043	Habitats Regulations Assessment	Habitats Regulations Assessment Fenns, Whixal, Bettisfield, Wem. Cadney Mosses, Marton Pool, Morton Pool, Brown Moss, Colemere, Whitemere SAC and Ramsar sites.	No	No	Not Specified	HRA: Fenns, Whixal, Bettisfield, Wem. Cadney Mosses, Marton Pool, Morton Pool, Brown Moss, Colemere, Whitemere SAC and Ramsar sites. 1. HRAs at project scale that consider foul drainage, water resource and recreational pressures are sufficient mitigation for the HRA2. 2. Provision for new green open spaces and nature networks should be planned now within the local plan to ensure that there is a co-ordinated plan for providing alternatives to these sites, particularly near Colemere where adverse recreational pressure has not been ruled out.
A0347	B044	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	No	No	Not Specified	The local plan provides a hook to the provision for Biodiversity net gain which is to be mandated by the forth coming Environment Bill. Evidence is not provided that there will be sufficient space on or off site to meet the 10% biodiversity net gain obligation. If Biodiversity net gain provision is planned together with the development allocations within the local plan then more coherent nature networks could be achieved.
A0347	B045	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (BRID001 and BRD0020b)	No	No	Not Specified	These sites are the livestock market so contaminated land aspects would have to be considered. There is a licensed borehole at this site which, if no longer used would have to be appropriately decommissioned
A0347	B046	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (W039)	No	No	Not Specified	This site is directly adjacent to the historic Old Worcester Road Tip, and on Principal aquifer so contaminated land aspects and potential landfill gas risks should be considered.
A0347	B047	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	STC002 and P58a	No	No	Not Specified	These sites are located on/adjacent to the Stanmore Industrial Estate and on Principal aquifer. P58a is located on SPZ3. Contaminated land aspects including appropriate surface water management will need consideration.
A0347	B048	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	ALV009	No	No	Not Specified	ALV009 is adjacent to groundwater springs/issues, so groundwater is likely to be shallow. Contaminated land, foundation dewatering and surface water management aspects will need consideration.
A0347	B049	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Morville Quarry Extension)	No	No	Not Specified	A water features survey will be needed to identify wells, springs, boreholes etc and demonstrate the nearby watercourse will not be adversely affected. A detailed conceptual model based on monitoring over a least one year is needed. Subsequent discharge should not result in adverse impacts. Restoration should protect water resources and will require an appropriate environmental permit. Dual-tracking of the planning and permitting process for mineral sites is advisable. If all potential adverse impacts are either unlikely or can be mitigated we would require a long term monitoring scheme and expect the applicants to remediate any deterioration to the water environment that this might detect.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0347	B039	n/a	The proposed reference to the importance of salmonids in the life-cycle of the Freshwater Pearl Mussel would have not have a material effect on the Appropriate Assessment so is not considered necessary.	No
A0347	B040	n/a	These comments are addressed in the Statement of Common Ground with EA	Yes
A0347	B041	n/a	Noted. No change proposed.	No
A0347	B042	n/a	1. The Canal & River Trust submitted comments to both the Regulation 18 and this consultation (Rep numbers 1844 and A402 respectively). The Council therefore considers that they have been adequately consulted on both the Local Plan and the HRA. No change proposed 2. As shown in the heading preceding section 3.51, 'introduction of invasive species or disease' is considered in sections 3.51 - 3.59. No change proposed.	No
A0347	B043	n/a	1. Noted. No change proposed. 2. Policy DP15 provides for more than 30m2 per person per bedroom space of open space where an adverse effect on the integrity of an internationally designated site has been identified. Policy DP14 ensures that all new development enhances existing green infrastructure assets and extends the green infrastructure network in accordance with the Shropshire Green Infrastructure Strategy. The Council thus considers that adequate provision is made for new open space and green networks in the Plan. No change proposed.	No
A0347	B044	n/a	Noted. No change proposed	No
A0347	B045	n/a	These two sites are saved allocations from the SAMDev Plan. No change proposed.	No
A0347	B046	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No
A0347	B047	n/a	Noted. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP19 comprehensively addresses the issue of water infrastructure and water quality.	No
A0347	B048	n/a	Noted. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP19 comprehensively addresses the issue of water infrastructure and water quality.	No
A0347	B049	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0347	B050	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (ELR078)	No	No	Not Specified	This site has serious implications for the SPZ and is likely to impose constraints on land use. The sources are particularly sensitive, and any surface pollution could rapidly pass to groundwater and potentially the abstraction boreholes.
A0347	B051	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (CSTR019)	No	No	Not Specified	This site is adjacent to groundwater springs/issues and surface watercourse, so groundwater is likely to be shallow. Contaminated land and surface water management aspects will need consideration
A0347	B052	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (All allocations)	No	No	Not Specified	The preferred sites overlies highly permeable sand and gravel deposits. The groundwater levels are also shallow. These superficial deposits have previously been used for public water supply, so are relatively high yielding. They will also provide baseflow to the River Onny. Appropriate development design and location (including dewatering of foundations, surface water drainage and pollution prevention measures etc) will therefore be essential in this area.
A0347	B053	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Ellesmere	No	No	Not Specified	Ellesmere is underlain by complex sequence of superficial deposits comprising clays, silts, sands and gravels. This is in turn underlain by the Permo-Triassic Sandstone. The sandstone is of regional strategic importance in terms of water supply and more local scale water requirements and baseflow to watercourses can arise from the superficial deposits. The depth to groundwater across the area is highly variable with shallow groundwater systems present within the shallow drift deposits. Therefore consideration of appropriate development design (including dewatering of foundations, surface water drainage and pollution prevention measures etc) will be required
A0347	B054	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Cockshutt	No	No	Not Specified	For Cockshutt, Tetchill, and Welsh Frankton there is a need to ensure adequate foul drainage and water supply. The protection of existing private supplies is also of importance as there are a number across these villages. In addition, a number of these locations, groundwater levels are known to be shallow and discharge of foul effluent to ground may not be appropriate.
A0347	B055	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Dudleston Heath	No	No	Not Specified	For Dudleston Heath to ensure adequate foul drainage and water supply. The protection of existing private supplies is also of importance as there are a number across these villages. In addition, a number of these locations, groundwater levels are known to be shallow and discharge of foul effluent to ground may not be appropriate.
A0347	B056	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Tetchill)	No	No	Not Specified	Need to ensure adequate foul drainage and water supply. The protection of existing private supplies is also of importance as there are a number across these villages. In addition, a number of these locations, groundwater levels are known to be shallow and discharge of foul effluent to ground may not be appropriate.
A0347	B057	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Welsh Frankton	No	No	Not Specified	Need to ensure adequate foul drainage and water supply. The protection of existing private supplies is also of importance as there are a number across these villages. In addition, a number of these locations, groundwater levels are known to be shallow and discharge of foul effluent to ground may not be appropriate.
A0347	B058	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Ellesmere Wood Lane Quarry)	No	No	Not Specified	1. There are a number of potentially adverse impacts that could arise due to the proposed activities (primarily any de-watering and the act of excavation potentially passively draining any perched groundwater systems). A water features survey will be needed to identify wells, springs, boreholes etc and private water supplies. A detailed conceptual model based on monitoring over a least one year is needed. Subsequent discharge should not result in adverse impacts. Restoration should protect water resources and will require an appropriate environmental permit. Dual-tracking of the planning and permitting process for mineral sites is advisable. If all potential adverse impacts are either unlikely or can be mitigated we would require a long term monitoring scheme and expect the applicants to remediate any deterioration to the `water environment that this might detect. 2. It is necessary to demonstrate no adverse impact on Colemere and other protected wildlife sites/species.
A0347	B059	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Burford BUR002	No	No	Not Specified	Records show presence of a borehole on this site. This will need to be appropriately decommissioned
A0347	B060	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Onibury ONBY003)	No	No	Not Specified	The site overlies highly permeable sand and gravel deposits. The groundwater levels are likely also shallow. Appropriate development design and location (including dewatering of foundations, surface water drainage and pollution prevention measures etc) will therefore be essential in this area
A0347	B061	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Market Drayton ELR023/024 and MDR034)	No	No	Not Specified	These sites are on Helsby Sandstone or Chester Sandstone Formation. They are also partly located within SPZ3. There is a surface water course in the vicinity and groundwater is likely to be shallow. Appropriate land use, mains foul drainage, surface water drainage design and pollution prevention measures would therefore be required
A0347	B062	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Market Drayton MDR012	No	No	Not Specified	This site is on Helsby Sandstone or Chester Sandstone Formation. They are also partly located within SPZ3. There is a surface water course in the vicinity and groundwater is likely to be shallow. Appropriate land use, mains foul drainage, surface water drainage design and pollution prevention measures would therefore be required.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0347	B050	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No
A0347	B051	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No
A0347	B052	n/a	These sites are saved allocations from the SAMDev Plan. No change proposed.	No
A0347	B053	n/a	Noted. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP19 comprehensively addresses the issue of water infrastructure and water quality.	No
A0347	B054	n/a	Noted. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP19 comprehensively addresses the issue of water infrastructure and water quality.	No
A0347	B055	n/a	Noted. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP19 comprehensively addresses the issue of water infrastructure and water quality.	No
A0347	B056	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No
A0347	B057	n/a	Noted. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP19 comprehensively addresses the issue of water infrastructure and water quality.	No
A0347	B058	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No
A0347	B059	n/a	Noted. No change proposed	No
A0347	B060	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No
A0347	B061	n/a	These sites are saved allocations from the SAMDev Plan. No change proposed.	No
A0347	B062	n/a	Local Plan policies cover the issues raised. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0347	B063	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Market Drayton MDR039/043	No	No	Not Specified	There is potentially a private water supply in the vicinity which if in use will need to be protected. Appropriate land use, mains foul drainage, surface water drainage design and pollution prevention measures would therefore be required.
A0347	B064	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Hinstock HIN009)	No	No	Not Specified	This site is located on the Permo-Triassic sandstone (principle aquifer) within SPZ3. Groundwater is shallow. Appropriate land use, dewatering of foundations, mains foul drainage, surface water drainage design and pollution prevention measures will be required.
A0347	B065	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Market Drayton HKW009	No	No	Not Specified	This site is located on the Permo-Triassic sandstone (principle aquifer) within SPZ3. Groundwater is shallow. Appropriate land use, dewatering of foundations, mains foul drainage, surface water drainage design and pollution prevention measures will be required.
A0347	B066	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Minsterley MIN007 and MIN018)	No	No	Not Specified	This site is adjacent to spring/surface watercourses. Groundwater is potentially shallow, so foundation dewatering and surface water management aspects will need consideration.
A0347	B067	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Minsterley MIN018	No	No	Not Specified	This site is adjacent to spring/surface watercourses. Groundwater is potentially shallow, so foundation dewatering and surface water management aspects will need consideration.
A0347	B068	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Much Wenlock MUW012VAR	No	No	Not Specified	The site falls within SPZ2/3. Appropriate land use, mains foul drainage, surface water drainage design and pollution prevention measures will be required.
A0347	B069	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Oswestry ELR043 and ELR072)	No	No	Not Specified	These sites are located on mixed drift overlying the Permo-Triassic sandstone within SPZ3. Given the scale of the development appropriate mains foul drainage, surface water drainage and pollution prevention measures will be required.
A0347	B070	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Kinnerley KNY002)	No	No	Not Specified	The depth to groundwater is likely relatively shallow so foundation dewatering and surface water management aspects will need consideration
A0347	B071	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Knockin KK001)	No	No	Not Specified	The site falls within the SPZ3 of a public water supply borehole. The depth to groundwater is likely to be shallow. There are also a number of private supplies. Given the sensitive hydrogeological setting appropriate drainage solutions will be required, foundation dewatering will need to be considered and we would discourage the proliferation of non-mains foul drainage
A0347	B072	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Knockin KCK009	No	No	Not Specified	The site falls within the SPZ3 of a public water supply borehole. The depth to groundwater is likely to be shallow. There are also a number of private supplies. Given the sensitive hydrogeological setting appropriate drainage solutions will be required, foundation dewatering will need to be considered and we would discourage the proliferation of non-mains foul drainage
A0347	B073	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Maesbrook)	No	No	Not Specified	The depth to groundwater is likely to be shallow. There are also a number of private supplies. Appropriate drainage solutions will be required and foundation dewatering will need to be considered and we would discourage the proliferation of non-mains foul drainage.
A0347	B074	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Ruyton XI Towns	No	No	Not Specified	The site is located within SPZ3 of a public water supply borehole. Shallow groundwater is probable. Dairy/industrial former site use, so contaminated land considerations. Appropriate land use, mains foul drainage, surface water drainage design and pollution prevention measures would therefore be required.
A0347	B075	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	St Martins	No	No	Not Specified	This is a former mining area so there may be ground contamination/stability issues that will need to be addressed. Given the proposed scale of the development mains foul drainage will be required.
A0347	B076	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	West Felton	No	No	Not Specified	The site is within the SPZ3 of a public water supply borehole. The depth to groundwater is likely to be relatively shallow. There are also a number of private supplies. Appropriate land use, mains foul drainage, surface water drainage design and pollution prevention measures would therefore be required. Foundation dewatering will need to be considered.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0347	B063	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B064	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No
A0347	B065	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B066	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No
A0347	B067	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B068	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B069	n/a	These sites are saved allocations from the SAMDev Plan. No change proposed.	No
A0347	B070	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No
A0347	B071	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No
A0347	B072	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B073	n/a	These sites are saved allocations from the SAMDev Plan. No change proposed.	No
A0347	B074	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B075	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B076	n/a	Local Plan policies cover the issues raised. No change proposed.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0347	B077	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Weston Rhyn	No	No	Not Specified	The site is adjacent to springs/issues and surface water course. So groundwater is likely to be shallow. Foundation dewatering and surface water management aspects will need consideration.
A0347	B078	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whittington	No	No	Not Specified	The site is located within SPZ3 of a public water supply borehole and shallow groundwater in places. Given the proposed scale of the development mains foul drainage will be required. Foundation dewatering and surface water management aspects will need consideration
A0347	B079	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Shifnal)	No	No	Not Specified	The proposed development sites overlie sand and gravel deposits which in turn overlie the Permo-Triassic sandstone. These form a strategically important source of public water supply. They fall within SPZ2. Groundwater levels are relatively shallow at 5 to10mbgl. It is therefore essential that appropriate land uses, drainage design and pollution prevention measures are adopted. This is particularly important for the employment site where a potentially wide range of activities may be proposed. The mains foul drainage infrastructure will have to be sufficient to support the development proposals.
A0347	B080	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Shifnal	No	No	Not Specified	The proposed development sites overlie sand and gravel deposits which in turn overlie the Permo-Triassic sandstone. These form a strategically important source of public water supply. They fall within SPZ2. Groundwater levels are relatively shallow at 5 to10mbgl. It is therefore essential that appropriate land uses, drainage design and pollution prevention measures are adopted. This is particularly important for the employment site where a potentially wide range of activities may be proposed. The mains foul drainage infrastructure will have to be sufficient to support the development proposals.
A0347	B081	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Shifnal	No	No	Not Specified	These sites overly the PWS abstraction and associated SPZ1. Appropriate foul and surface water drainage design and pollution prevention measures will be required. Early consultation with the water utility provider as Key Stakeholder will be essential in order to prevent delays to development planning process. Within SPZ1 the Environment Agency will object to certain land uses
A0347	B082	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Shrewsbury	No	No	Not Specified	These sites are located within SPZ3. Therefore it will be necessary to ensure appropriate mains foul drainage and surface water drainage.
A0347	B083	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Shrewsbury	No	No	Not Specified	This site is adjacent to a number of private water supplies and close to a spring/issues. Therefore drainage design and pollution prevention measures will be required.
A0347	B084	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Shrewsbury	No	No	Not Specified	A number of private water supplies are recorded in the area, consequently given the size of the proposed developments appropriate mains foul drainage will be required.
A0347	B085	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Shrewsbury	No	No	Not Specified	This site is located within SPZ3 and is adjacent to a well. Therefore it will be necessary to ensure appropriate mains foul drainage and surface water drainage.
A0347	B086	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Shrewsbury	No	No	Not Specified	This site falls within SPZ2/3 of a public water supply source. Consequently the hydrogeological setting is highly sensitive. It is therefore essential that appropriate land uses, drainage design and pollution prevention measures are adopted.
A0347	B087	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Shrewsbury)	No	No	Not Specified	This site is located in SPZ3 of a public water supply source and groundwater is relatively shallow. It will therefore be necessary to ensure appropriate foul (mains) and surface water drainage are provided.
A0347	B088	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Shrewsbury)	No	No	Not Specified	The site is underlain by sands and gravels which are in turn underlain by the Carboniferous Salop Formation. A water features survey will be needed to identify wells, springs, boreholes etc and private water supplies (records indicate the latter in the area). It will be necessary to show that those local wildlife sites in close proximity would not be adversely affected and a detailed conceptual model based on monitoring over a least one year is needed for this. Subsequent discharge should not result in adverse impacts. Restoration should protect water resources and will require an appropriate environmental permit. Dual-tracking of the planning and permitting process for mineral sites is advisable. If all potential adverse impacts are either unlikely or can be mitigated, we would require a long term monitoring scheme and expect the applicants to remediate any deterioration to the `water environment that this might detect
A0347	B089	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Wem)	No	No	Not Specified	The groundwater is relatively shallow within the superficial deposits and there are a number of ponds/spreads, springs and watercourses in the vicinity. There is the potential for contamination issues associated with adjacent land uses which should be considered prior to development. Mains foul drainage should be adopted and the surface water drainage should also be carefully designed as there are a number of private water supplies in the immediate vicinity.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0347	B077	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B078	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B079	n/a	These sites are saved allocations from the SAMDev Plan. No change proposed.	No
A0347	B080	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B081	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B082	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B083	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B084	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B085	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B086	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B087	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No
A0347	B088	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No
A0347	B089	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0347	B090	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Wem	No	No	Not Specified	The groundwater is relatively shallow within the superficial deposits and there are a number of ponds/spreads, springs and watercourses in the vicinity. There is the potential for contamination issues associated with adjacent land uses which should be considered prior to development. Mains foul drainage should be adopted and the surface water drainage should also be carefully designed as there are a number of private water supplies in the immediate vicinity.
A0347	B091	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 1 (Whitchurch)	No	No	Not Specified	Mains foul drainage should be adopted and the surface water drainage should also be carefully designed as there are a number of private water supplies in the immediate vicinity.
A0347	B092	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S19 Clive Barracks, Tern Hill	No	No	Not Specified	Given its history contaminated land aspects will need consideration. Appropriate land uses, drainage design and pollution prevention measures will be required.
A0347	B093	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Former Ironbridge Power Station	No	No	Not Specified	Given its history contaminated land aspects will need consideration. Appropriate land uses, drainage design and pollution prevention measures will be required. We are currently reviewing information to inform a number of planning applications at this location.
A0347	B094	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	RAF Cosford	No	No	Not Specified	The site lies within the SP22/3 of the Cosford, Hellbank and Neachley public water supply boreholes. Appropriate land uses, drainage design and pollution prevention measures will be required. Being an active MOD site/airfield there is a strong likelihood of land contamination issues across parts of the site. The effects of groundworks/development in liberating and mobilising contaminants should be of particular consideration with regard to risk to the public water supply boreholes. We advise the inclusion of land contamination risk assessments and remediation plans as a pre-requisite to drainage design such that early resolution of related issues informs the site layout and drainage planning process. It will also give developers the certainty for any remediation costs and timescales. Given the site history, consideration should be given to detection and assessment of potential (chlorinated) solvent dnapl plumes (e.g. aircraft maintenance activities) and also per- and polyfluoroalky substances (e.g. firefighting activities).
A0348	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16 SHR166 and Policies map S16.b	Not Specified	No	Not Specified	1. Development is likely to result in a direct negative impact to the significance of a non-designated heritage asset and its setting. 2. There is insufficient evidence about the significance of archaeological remains (which comprise the non-designated heritage asset as above) to inform this allocation. If allocation proceeds, there is a risk that a non-designated heritage asset that is demonstrably of equivalence to a scheduled monument would be lost. Mitigation is not a clear and convincing justification for the substantial harm that is likely to be caused by development. A thorough archaeological evaluation is needed to determine the appropriate level of significance of this asset. This should be carried out before the site is considered for allocation. 4. Development of this site is within the setting of three Scheduled Monuments on Haughmond Hill, one of which is also a Grade I Listed Building. Whilst the harm to their settings would be less than substantial, the cumulative impact of development for all three would be detrimental to understanding their relationship to Shrewsbury. This is particularly so because an employment use means very large sheds which would be in the foreground of views. 5. The allocation of this site would mark a major change to the eastern edge of Shrewsbury. The current rural setting of the town to the east of the river Severn is not only important for the Scheduled Monuments on Haughmond Hill, it also provides a finer grain and more accessible context for understanding the town's historical setting within the tight loop of the river. 6. Development in this location may result in pressure for further development between the river Severn and Haughmond Hill and it is not clear how this site's allocation fits with other development opportunities that may arise to the north and west of Shrewsbury linked to the planned North West Relief Road.
A0348	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Not Specified	Yes	Not Specified	1. We raised concerns at previous consultation stages that the Plan was not sound because it was unclear how the historic environment had been considered in the Plan making process. Advice was given on how this might be rectified, with particular reference to the proposed allocation of SHR166. We note that the Council then produced a Supplementary Site Assessments paper and we now consider that sufficient analysis has been undertaken. We are satisfied that the Council's approach is consistent with Historic England Advice Note 3 and NPPF para 190 for sites LUD052, KCK007, LYH007, PPW025 and WHN024. 2. We have considered Heritage Impact Assessments and masterplans provided by the site promoters for BRD030, SHR166 and IRN001 ahead of this response, as requested by the Council. However, as the Council does not view these as part of the evidence base for the Plan, we are unclear what weight is being given to them.
A0348	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Shropshire's Character, para 2.9	Not Specified	Yes	Not Specified	Historic England welcomes the inclusion of paragraph 2.9, which focuses on the number of designated heritage assets and the wealth of non-statutory undesignated assets within Shropshire; creating a county with a rich historic environment.
A0348	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Spatial Vision, para 2.31	Not Specified	Yes	Not Specified	Historic England welcomes the inclusion of the aspiration that the County's historic and natural environmental assets will be protected and enhanced (paragraph 2.31).
A0348	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	Not Specified	Yes	Not Specified	Historic England welcomes the inclusion of this strategic policy seeking to ensure that development enhances the area's character and historic environment.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0347	B090	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B091	n/a	This site is a saved allocation from the SAMDev Plan. No change proposed.	No
A0347	B092	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B093	n/a	Local Plan policies cover the issues raised. No change proposed.	No
A0347	B094	N/A	Noted. Draft Policy S21 includes a proposed guideline that "Noise, odour and any contaminated land will be appropriately considered and if necessary mitigated." Furthermore, the draft Shropshire Local Plan should be read as a whole. Draft Policy DP19 comprehensively addresses the issue of water infrastructure and water quality.	No
A0348	B001	Remove allocation of SHR166	Agreement has been reached on the issue of the impact of development on the significance of the settings of the Scheduled Monuments on Haughmond Hill and a minor modification is proposed to the 7th paragraph of the site guidelines. Haughmond Abbey Scheduled Monument has been excluded from this on the basis of no likely effect due to distance from the proposed allocation. Agreement has not been reached on the allocation's effect on the significance of the early Roman Marching Camp and the Council proposes to continue with the site's allocation with the addition of a second minor modification to the 7th paragraph of the site guidelines. Details of the Council's responses to these issues are set out in the Statement of Common Ground between Historic England and Shropshire Council.	Yes
A0348	B002	n/a	Noted; no actions proposed.	No
A0348	B003	n/a	Noted; no actions proposed.	No
A0348	B004	n/a	Noted; no actions proposed.	No
A0348	B005	n/a	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0348	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Not Specified	Yes	Not Specified	Historic England welcomes the references to local character and historic interests, as well as building materials and detailing, included in this strategic policy which offers the opportunity to conserve and enhance the historic environment.
A0348	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Not Specified	Yes	Not Specified	The acknowledgment of the critical role the historic environment plays in the health and welfare of individuals and communities in Shropshire is supported in this strategic policy
A0348	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	Yes	Not Specified	Historic England welcomes the inclusion of respecting heritage assets as a consideration for assessing development sites in Community Hubs.
A0348	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	Not Specified	Yes	Not Specified	Historic England welcomes the inclusion of respecting heritage assets as a consideration for assessing development sites in Community Clusters.
A0348	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	Not Specified	Yes	Not Specified	Historic England welcomes the inclusion of the requirement for proposals for the replacement of buildings which contribute to the local distinctiveness, landscape character and historic environment to be resisted, unless other sustainability considerations can be demonstrated and that and the requirements of Historic Environment Policy DP23 can be met, which will assist in safeguarding heritage assets.
A0348	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Not Specified	Yes	Not Specified	Historic England welcomes reference to the historic environment in this policy, particularly in terms of reference. The context of the policy offers potential opportunities for heritage led regeneration which could conserve and enhance the historic environment.
A0348	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	Not Specified	Yes	Not Specified	Historic England welcomes this strategic policy requiring that development of employment generating uses need to demonstrate that they satisfy the requirements of national and local policies, especially to conserve historic environments, except where justified.
A0348	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Not Specified	Yes	Not Specified	Historic England welcomes the inclusion in the requirements of this policy, that proposals for development in the 'strategic corridors', must satisfy the requirements of Policy SP13 and consider the scale of the proposal in relation to the significance of the historic environment.
A0348	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	Not Specified	Yes	Not Specified	Historic England welcomes the requirement in this policy that 'Whole Estate Plans' must be prepared by Estates in collaboration with relevant external organisations, including statutory bodies and is keen to work with landowners to ensure sustainable estate management with regard to the historic environment.
A0348	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP16	Not Specified	Yes	Not Specified	The reference to locally distinctive materials is noted and welcomed
A0348	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP9	Not Specified	Yes	Not Specified	The content of draft Policy DP9 is noted and would offer opportunities to conserve and enhance the historic environment, including projects such as Oswestry High Street Heritage Action Zone.
A0348	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP10	Not Specified	Yes	Not Specified	Supports the aim of draft Policy DP10 and welcome recognition of the role that the historic environment plays in the tourist industry. In particular: Emphasis on promoting and preserving the distinctive historic, heritage brand and values of Shrewsbury, the Market Towns and rural areas is welcomed. Support for canal side development that enhances the role of canals as a multifunctional resource and heritage asset is welcomed. Requirement for proposals for new and extended touring caravan and camping sites to have strong regard to the cumulative impact of visitor accommodation on the historic assets of the area is also welcomed.
A0348	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP16	Not Specified	Yes	Not Specified	Reference to heritage assets and setting in Criterion 3d of draft Policy DP16 is welcomed.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0348	B006	n/a	Noted, no actions proposed.	No
A0348	B007	n/a	Noted.	No
A0348	B008	n/a	Noted; no actions proposed.	No
A0348	B009	n/a	Noted; no actions proposed.	No
A0348	B010	n/a	Noted; no actions proposed	No
A0348	B011	n/a	Noted; no actions proposed	No
A0348	B012	n/a	Shropshire Council welcomes the support for Policy SP13 and the employment development strategy for Shropshire which is considered to be appropriate, effective, sustainable and deliverable.	No
A0348	B013	n/a	Shropshire Council welcomes the support for Policy SP14 as part of the employment development strategy for Shropshire which is considered to be appropriate, effective, sustainable and deliverable.	No
A0348	B014	n/a	Noted; no actions proposed.	No
A0348	B015	n/a	Noted, no actions proposed.	No
A0348	B016	N/A	Noted.	No
A0348	B017	N/A	Noted.	No
A0348	B018	N/A	Support welcomed	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0348	B019	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17	Not Specified	Yes	Not Specified	Reference to the Shropshire Landscape Typology within draft Policy DP17 is welcomed as aware this typology includes historic landscape character information.
A0348	B020	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23	Not Specified	Yes	Not Specified	Inclusion of Policy DP23 is welcomed. It is considered that the policy sets out a positive strategy for the conservation and enjoyment of the historic environment. Note that the explanation to the policy (at para. 4.203) includes a list of what constitutes designated and non-designated heritage assets, which is also welcomed, but all references to 'Scheduled Ancient Monuments' should be revised to 'Scheduled Monuments' in line with National Planning Policy Framework (NPPF) terminology.
A0348	B021	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP24	Not Specified	Yes	Not Specified	Welcome reference to consideration of historic assets as part of the considerations to be encompassed within an assessment required to be provided for all major development within the AONB. Consider draft Policy DP23 should be added to the list of policies specifically referred to.
A0348	B022	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP26	Not Specified	Yes	Not Specified	Welcome reference in draft Policy DP26 to the need for assessments accompanying Planning Applications for non-wind renewable and low carbon development to comprise the consideration of historic assets (including the considerations within Policy DP23).
A0348	B023	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP31	Not Specified	Yes	Not Specified	Note minerals safeguarded areas and site allocations carried forward in draft Policy DP29 and also the sites for sand and gravel working carried forward under draft Policy DP30. Welcome reference to the historic environment in draft Policy DP31 in respect of development proposals requiring particular consideration to protecting, conserving and enhancing the significance of heritage assets including archaeology.
A0348	B024	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP32	Not Specified	Yes	Not Specified	Reference in draft Policy DP32 to the requirement for applicants to demonstrate that potential adverse impacts on Shropshire's historic environment can be satisfactorily controlled is welcomed by Historic England.
A0348	B025	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2 CLU005	Not Specified	Yes	Not Specified	Welcome recognition of Clun as historically significant in para 5.42 of the draft Shropshire Local Plan and the various heritage assets mentioned. With regard to proposed allocation CLU005, welcome development guideline for this site to undertake a heritage assessment to satisfy national and local heritage policies.
A0348	B026	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1(i) BRD030	Not Specified	Yes	Not Specified	With regard to the development guidelines for proposed allocation BRD030 (Tasley Garden Village): Welcome the proposed approach to develop the site in accordance with a vision, design code and masterplan, to be adopted as a Supplementary Planning Document by Shropshire Council. Given the heritage assets within the site and the wider area, Historic England would welcome involvement in the master planning of the development as the process evolves. The requirement for the site's design and layout to reflect and respect the site's heritage and heritage assets within the wider area is welcomed, as is the requirement for the retention of listed and non-designated historic farm buildings. Whilst the prerequisite that green infrastructure will create appropriate settings for identified heritage assets and for the retention of historic field patterns and hedgerows is welcomed, it is considered that the word 'safeguard' instead of 'create' would ensure that the settings of heritage assets are conserved in an appropriate manner. Satisfied that the impact on the heritage assets can be adequately mitigated, but recommend Development Guidelines incorporate a requirement that any Planning Application should be accompanied by a heritage statement and an archaeological assessment. Note this is included within the Stage 3 assessment for this site in the Appendix of the Sustainability Appraisal accompanying the Plan, but this has not been carried through into the Development Guidelines within the draft Shropshire Local Plan.
A0348	B027	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S9.1(i) HNN016	Not Specified	Yes	Not Specified	Welcomes the requirement within the Development Guidelines for site HNN016, that the design and layout of this 100 unit housing site will reflect and respect the site's heritage and heritage assets within the wider area, including Grade II listed Hazelwell's Farm House, and that landscape buffers will be required to create appropriate settings for nearby heritage assets and built form. However, consider that to inform the above the Development Guidelines should also include the requirement for a heritage assessment.
A0348	B028	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S10.1(i) Ludlow (LUD056 and LUD052)	Not Specified	Yes	Not Specified	Welcome point 2 of the proposed strategy for Ludlow, which seeks to protect, conserve and enhance the significance of Ludlow's heritage assets and protect the setting of this historic town. With regard to proposed allocation LUD056, note that the proposed development guidelines for this site require a Heritage Impact Assessment to respect archaeological interest as this is the former site of the Fishmore Brick and Pipe Works. With regard to proposed allocation LUD052, whilst the requirement within the proposed development guidelines for a Heritage Impact Assessment, considering cumulative impacts on the significance of heritage assets located within Ludlow to the west and also the significance of the scheduled monument at Caynham Camp to the east (including its setting), is welcome, reiterate some of the previous concerns identified. Recommend the proposed development guidelines include a specific requirement for a low-rise form of development to take into account any impact, particularly the longer-term effects of cumulative development, on the setting of Caynham Camp and that Shropshire Council may wish to consider that longer term a Local Development Order for the site may assist in terms of setting out what may be appropriate in relation to permitted development.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0348	B019	N/A	Noted.	No
A0348	B020	References to Scheduled Ancient Monuments should be updated to Scheduled Monuments, in lined with the National Planning Policy Framework (NPPF).	Agreed. The reference to Scheduled Ancient Monuments occurs elsewhere in the Plan as well, so the Council proposes to make minor modifications to paragraphs 2.9 and 4.203 to remove the word Ancient.	Yes
A0348	B021	Include cross-reference to Policy DP23.	Agreed. For clarity a minor modification is proposed to Policy DP24, paragraph 3 to include a cross reference to Policy DP23.	Yes
A0348	B022	N/A	Noted	No
A0348	B023	N/A	Noted.	No
A0348	B024	N/A	Noted.	No
A0348	B025	N/A	The support for the settlement strategy for Clun is welcomed and recognises that the town is appropriately designated as a Community Hub and has identified a suitable housing allocation on site CLU005 to extend the current, saved SAMDev housing allocation on site CLUN002.	No
A0348	B026	In proposed site guidelines for BRD030 (Tasley Garden Village): With regard to settings for heritage assets, consider the word 'safeguard' instead of 'create' would ensure that the settings of heritage assets are conserved in an appropriate manner. Include a Development Guideline requiring that any Planning Application should be accompanied by a heritage statement and an archaeological assessment.	Noted. For clarity, two minor modifications are proposed to the 15th paragraph of the draft Site Guidelines for site BRD030 (Tasley Garden Village) in Schedule 3.1(i) to include need for heritage assessment including archaeological assessment.	Yes
A0348	B027	For site HNN016, include a Development Guideline requiring that any Planning Application should be accompanied by a heritage assessment.	A minor modification is proposed to the 3rd paragraph of the draft Site Guidelines for site HNN016 in Schedule 9.1(i) to reflect the need for a heritage assessment, which will inform site design and layout.	Yes
A0348	B028	For site LUD052, recommend proposed development guidelines include a specific requirement for a low-rise form of development to take into account any impact, particularly the longer-term effects of cumulative development, on the setting of Caynham Camp. Shropshire Council may wish to consider that longer term a Local Development Order for the site may assist in terms of setting out what may be appropriate in relation to permitted development.	Shropshire Council welcomes the support for Policy S10.1 recognising that the strategy for the Market Town of Ludlow will provide an opportunity to deliver new housing and employment development to strengthen role and function of the town and to support the rural settlements and communities in the Ludlow Place Plan area. A minor modification is proposed to the 5th paragraph of the draft site guidelines for site LUD052 in Schedule 10.1(ii) to reflect the need for the design of development to pay particular attention to building height, layout and materials.	Yes

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0348	B029	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S10.2(i) BUR002	Not Specified	Yes	Not Specified	Welcome requirement within the proposed development guidelines for site BUR002 that the design, layout and landscaping of the development should recognise the significance and setting of the heritage assets situated close to the site and supports the requirement for an assessment of the archaeological potential of the site situated close to Turnpike Cottage and the former Turnpike route along the A456, and also located near to Castle Trump Scheduled Monument.
A0348	B030	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S10.2(i) CHK002	Not Specified	Yes	Not Specified	Note the requirement within the proposed development guidelines for site CHK002, for a heritage impact assessment regarding archaeological interest, as the site was formerly a coal and ironstone workings.
A0348	B031	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1(i) MDR012 & MDR034	Not Specified	Yes	Not Specified	Note that development of a marina is key objective for Market Drayton (para. 5.155), seeking to utilise the town's proximity to the Shropshire Union Canal. Suggest that if proposed allocations MDR012 and MDR034, as well as the existing and protected employment sites in this general area could be considered overall in relation to the potential marina development at Victoria Farm, within a masterplanned approach, then this would assist with wider connections for people and enhancement and enjoyment of heritage assets.
A0348	B032	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.2 HHH001 & HHH014	Not Specified	Yes	Not Specified	Note the Council has undertaken 'Supplementary Site Assessments' with regard to proposed allocations HHH001 and HHH014. Whilst this is welcomed, it is unclear that the significance of these sites to the Hodnet Conservation Area & to the Registered Park and Garden of Hodnet Hall has been fully considered. Further analysis, in line with the methodology set out in HEAN 3, is therefore suggested prior to allocation. Specifically, the 1st edition OS map shows a gap in boundary planting along the east side of Hodnet Hall Registered Park, opposite HHH001 and HHH014. This would appear to have provided a view to the rural landscape to the east, across the allocation site, and possibly into the distance; perhaps intended to be seen while travelling along the south drive of Hodnet Hall. Although this view is no longer available, it could be recoverable. Development on HHH001 and HHH014 would remove this possibility and also lead to the further, incremental loss of the rural setting of the park along its east boundary, as new clusters of settlement would join and become contiguous with the original village and conservation area. This would have a degree of harmful impact on the significance, derived from its setting, of the registered park and garden and potentially the other heritage assets within it. Note that the Development Guidelines for these sites include the requirement for a Heritage Impact Assessment and a high-quality site design and layout. However, note that the Supplementary Site Assessment sets out several more detailed measures to ensure that any residual harm to the Hodnet Conservation Area and other heritage assets will be mitigated, such as: low density development; incorporating well designed landscape and amenity space; good quality timber joinery detailing; and a palate of materials that is informed by, and in keeping with, the local vernacular. Suggest the proposed Development Guidelines are strengthened by the inclusion of these additional measures in order to <b>conserve and enhance the historic environment of Hodnet.</b>
A0348	B033	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 CES006	Not Specified	Yes	Not Specified	Welcome provisions of the draft Development Guidelines for CES006 which require supporting studies, including heritage and archaeology, and that the recommendations of these should be clearly reflected in the proposed development scheme for the sympathetic conversion of the former Eagles Inn pub building (Grade II Listed) to dwellings and the development of the former pub car park for further residential units.
A0348	B034	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2(i) KCK009	Not Specified	Yes	Not Specified	The Council has undertaken a 'Supplementary Site Assessment' with regard to KCK009, which concludes that 'in principle development in this location would not cause harm to the significance of the Conservation Area as a result of inappropriate impacts on its setting, subject to it being of a comparable design, scale and layout to that which has been built most recently to the south'. This is welcomed and we note that the proposed Development Guidelines for KCK009 include stipulations for a Heritage Impact Assessment to be carried out and its recommendations taken into account with respect to the impact of the development on the significance of the Knockin Conservation Area. However, it is considered that the proposed Development Guidelines should be strengthened by the inclusion of more specific guidance relating to the design, scale and layout of the proposed allocation (as per the Supplementary Site Assessment), and thereby mitigating any harm that may be caused to the significance of the Conservation Area. Additionally, welcome that the 'Supplementary Site Assessment' of KCK009 includes assessment of the site in relation to the significance of the Scheduled Monument of Knockin Castle and its setting. With regard to non-designated archaeology, it is noted that two linear earthwork features (HER PRN 03723), (the remains of two substantial, infilled medieval ditches), would be partially destroyed by development of HHH001 and HHH014. Although, it is suggested that mitigation could be achieved at the development management stage through archaeological recording, secured by a planning condition, and that the requirements of which should be informed by an initial desk based assessment and field evaluation that are undertaken prior to submission of a planning application, this is not mentioned in the Development Guidelines at present and it is therefore recommended that these specific requirements be included.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0348	B029	N/A	Shropshire Council welcomes the support for Policy S10.2 recognising that the town of Burford is appropriately designated as a Community Hub and that the strategy will provide an opportunity to deliver new housing in Burford to support the rural area around the Market Town of Ludlow and also the adjacent town of Tenbury located in Worcestershire. This strategy identifies a number of suitable housing allocations including BUR002 which will be subject to the assessment of any impacts from this development on heritage assets close to BUR002 through a heritage impact assessment and archaeological investigation. The support for this approach to the development of site BUR002 is also welcomed.	No
A0348	B030	N/A	Shropshire Council welcomes the support for Policy S10.2 recognising that the village of Clee Hill is appropriately designated as a Community Hub and that the strategy will provide an opportunity to deliver new housing in the rural area around the Market Town of Ludlow. This strategy has identifies a suitable housing allocation on site CHK002 which will be subject to the assessment of any impacts from this development on the former coal and ironstone workings around Clee Hill through a heritage impact assessment and archaeological investigation. The support for this approach to the development of site CHK002 is also welcomed.	No
A0348	B031	Consider MDR012 and MDR034, as well as the existing and protected employment sites in this general area, within a masterplanned approach to the potential marina development at Victoria Farm.	Noted. Shropshire Council considers that an effective approach to the development of existing and proposed allocations at Market Drayton is established within the draft Shropshire Local Plan and elements of the adopted SAMDev Plan proposed to be saved. It is also considered that draft Policy S11.1 provides an appropriate context for the opportunities to deliver a marina and related uses on land at Victoria Farm. If any such development is proposed, it would be subject to detailed consideration through the Planning Application process.	No
A0348	B032	Undertake further analysis of the site, in line with the methodology set out in HEAN 3, prior to allocation. This should consider the degree of harmful impact resulting from development of HHH001 and HHH014 on the significance, derived from its setting, of the registered park and garden and potentially the other heritage assets within it. Amend the proposed site guidelines for HHH001 and HHH014 to include the detailed measures identified within the Supplementary Site Assessment. Such as: low density development; incorporating well designed landscape and amenity space; good quality timber joinery detailing; and a palate of materials that is informed by, and in keeping with, the local vernacular.	It is considered that sufficient analysis of the impact of development on the significance of Hodnet Hall Registered Park and Garden and its setting has been undertaken both through the site assessment process and the Supplementary Site Assessment carried out by the Historic Environment Manager. However, a minor modification is proposed to the 3rd paragraph of the draft site guidelines for site HHH001 and HHH014 in Schedule 11.2 to reflect the need for good quality timber joinery detailing and a palate of materials informed by, and in keeping with, the local vernacular.	Yes
A0348	B033	N/A	Shropshire Council welcomes the support for Policy S13.2 and the designation of Cressage as a Community Hub. This support is welcomed as evidence of the soundness of the Draft Local Plan.	No
A0348	B034	Proposed Development Guidelines for KCK009 should be strengthened by: -Inclusion of more specific guidance relating to the design, scale and layout of the proposed allocation (as per the Supplementary Site Assessment), and thereby mitigating any harm that may be caused to the significance of the Conservation Area. -Specifying that archaeological recording will be undertaken, secured by a planning condition, and that the requirements of this archaeological recording should be informed by an initial desk based assessment and field evaluation undertaken prior to submission of a Planning Application.	A minor modification is proposed to the 2nd paragraph of the site guidelines for KCK009 in Schedule S14.2(i) to reflect the need for an archaeological assessment prior to a planning application, the need to take into account non-designated archaeological features and that the design of development should reflect the findings of the Heritage Assessment.	Yes



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0348	B035	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2(i) LYH007	Not Specified	Yes	Not Specified	Welcome that the Council has undertaken a 'Supplementary Site Assessment' for LYH007, regarding the potential impact on the significance of the Llanymynech Village and Heritage Conservation Area and the potential impact on the settings and significance of the Scheduled Monument of Lime kilns, associated tramways, structures and other buildings at Llanymynech (Llanymynech Lime Works) (NHLE ref. 1021412). Note proposed Development Guidelines for LYH007 include stipulations for a Heritage Impact Assessment to be carried out and its recommendations taken into account with respect to the impact of the development on the significance of the Llanymynech Conservation Area and its setting. However, recommend that proposed Development Guidelines be strengthened through the inclusion of more specific guidance relating to the design, scale and layout of the proposed allocation, to ensure that the development is comparable to the recent development of site LLAN009. Additionally, welcome the assessment of the site in relation to the significance of the Llanymynech Lime Works Scheduled Monument and note that a well-designed landscape buffer along the canal is also recommended, in addition to the design considerations set out in relation to the Conservation Area. However, this is also not mentioned in the proposed Development Guidelines and it is therefore recommended that these specific requirements also be included.
A0348	B036	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2(i) WHN024	Not Specified	Yes	Not Specified	Welcome that the Council has undertaken a 'Supplementary Site Assessment' for WHN024, regarding the potential impact on the significance of the Whittington Conservation Area as a consequence of impacts upon its setting and the potential impacts on the setting and significance of the Scheduled Monument and Grade I Listed Building of Whittington Castle (NHLE refs. 1019450 & 1178307). Note proposed Development Guidelines for WHN024 include the requirement for a proportionate Heritage Impact Assessment to be carried out, and its recommendations taken into account, with respect to the impact of the development on the significance of the Whittington Conservation Area and its setting, and the significance, including the setting, of any other heritage assets close to the site. Also note that the Supplementary Assessment undertaken recommends that an archaeological desk based assessment, and if appropriate a field evaluation, should be submitted with any planning application so that a suitable level of archaeological mitigation can be secured by condition if necessary. However, this is not mentioned in the proposed Development Guidelines, recommend that these specific requirements also be included.
A0348	B037	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2(i) FRD011	Not Specified	Yes	Not Specified	Welcomes proposed Development Guideline for FRD011 which requires supporting studies, including a heritage assessment with particular focus on potential archaeology and that their recommendations should be clearly reflected in the development scheme for the site.
A0348	B038	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.2(i) PPW025	Not Specified	Yes	Not Specified	Note the Council has undertaken a 'Supplementary Site Assessment' for PPW025, regarding the potential impact on the significance of the Prees Conservation Area as a consequence of impacts upon its setting and the potential impacts on the settings and significance of the three closest listed buildings (all Grade II): Nos. 14 to 16 (inclusive),Whitchurch Road (NHLE ref. 1236426); No. 9 Whitchurch Road (NHLE ref. 1222022); and the barn c.20m N of Tudor House (NHLE ref. 1264627). This concludes in principle development would not cause harm to the significance of the Conservation Area as a result of inappropriate impacts on its setting, due to the Conservation Area being bounded by existing development to the north and west and thus this land parcel not being considered to make any particular contribution to the significance of the Conservation Area's setting. However, it is noted that the Supplementary Assessment states this would be subject to development being of a comparable scale to adjacent form and of good design standard, with a palate of materials that is informed by and is in keeping the local vernacular. Whilst proposed Development Guidelines require a proportionate Heritage Impact Assessment and its recommendations to be taken into account, they do not include the above requirements, it is suggested they should. With regard to the adjacent listed buildings, the Supplementary Assessment identifies the potential for harm to nos. 14 to 16 Whitchurch Road and also to the setting of the Barn c.20m north of Tudor House, which mainly comprises the surrounding historic farmstead of which it forms a part. Suggested mitigation, set out in the Supplementary Assessment includes careful consideration of scale, massing and layout of development on the part of the site fronting Whitchurch Road and provision of a suitable and well-designed landscape buffer at the southern end of the site, to provide an area of amenity space and a stand off from the Barn. These are not included within the proposed development guidelines and it is strongly suggested that these be added, together with the requirement for an archaeological desk-based assessment, and if appropriate a field evaluation, to be submitted with any planning application, also referenced in the Supplementary Assessment.
A0348	B039	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S20 IRN001	Not Specified	Yes	Not Specified	Welcomes the masterplan approach to inform the redevelopment of the Former Ironbridge Power Station site. Note the draft Shropshire Local Plan requires redevelopment of the Former Ironbridge Power Station site to conform to a number of site guidelines, comments are as follows: 3a. Consider that Buildwas Abbey, as a visitor destination should be recognised as both a constraint, to which nearby development must respond and especially in terms of how the Abbey's setting contributes to its significance, and an opportunity to enhance visitor experience within the Masterplan. It is important that the Council and the developers engage with English Heritage in discussions on this issue. 3e. Note reference to a heritage centre and the aim that the community facilities and buildings will tap-into the heritage of the site. 3j. Recommend that the design and layout of the site should be informed by clearer design guidance both of individual buildings and the overall structure of the development. As a consultee on the planning application Historic England notes that the approach taken to date highlights the influences both of nearby medieval market towns as well as C18th industrial villages in the World Heritage Site (WHS). Consider this to be potentially confusing and would place emphasis on the latter over the former, as the development will border the WHS and be within the head of the Ironbridge Gorge. This should be evidenced and informed by local character and also by an assessment of how setting contributes to the significance of the WHS, which should focus wider than just views, and recommendations included in the Policy Guidelines with respect to the design of urban realm, buildings, including roofing materials, heights, massing and lighting etc. 3k. This guideline is supported as it will ensure that the Grade II listed Albert Edward railway bridge on the site's boundary and buildings and structures associated with the Ironbridge A interwar power station will be sympathetically retained, enhanced/maintained and adaptively reused.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0348	B035	<p>Proposed Development Guidelines for LYH007 should:</p> <ul style="list-style-type: none"> <li>-Include more specific guidance relating to the design, scale and layout of the proposed allocation, to ensure that the development is comparable to the recent development of site LLAN009.</li> <li>-Require a well-designed landscape buffer along the canal.</li> </ul>	<p>5.8.5.A minor modification is proposed to the 2nd paragraph of the draft Site Guidelines for site LYH007 in Schedule 14.2(i) to reflect the need for the design of development to be based on the results of the Heritage Impact Assessment and to include a buffer to the canal.</p>	Yes
A0348	B036	<p>Proposed Development Guidelines for WHN024 should require an archaeological desk based assessment, and if appropriate a field evaluation to be undertaken and submitted with any Planning Application.</p>	<p>A minor modification is proposed to the 2nd paragraph of the draft Site Guidelines for site WHN024 in Schedule 14.2(i) to reflect the need for an archaeological assessment (desk based with field work as necessary).</p>	Yes
A0348	B037	N/A	<p>The support is welcomed for Policy S16.2 in the draft Shropshire Local Plan setting out the settlement strategy for Ford and recognising the significance of the proposed housing allocation to the role of the village and the opportunity to secure new housing within this community and recognising the contribution this will make to the growth of Shropshire.</p>	No
A0348	B038	<p>Proposed Development Guidelines for PPW025 should require:</p> <ul style="list-style-type: none"> <li>-Development to be of a comparable scale to adjacent built form and of good design standard, with a palate of materials that is informed by and is in keeping the local vernacular.</li> <li>-Careful consideration of scale, massing and layout of development on the part of the site fronting Whitchurch Road and provision of a suitable and well-designed landscape buffer at the southern end of the site, to provide an area of amenity space and a stand off from the Barn.</li> <li>-An archaeological desk-based assessment, and if appropriate a field evaluation, to be submitted with any planning application.</li> </ul>	<p>5.10.4.A minor modification is proposed to the 4th paragraph of the draft Site Guidelines for site PPW025 in Schedule 18.2(i) to reflect the need for the design of new development to be comparable in scale and form to adjacent buildings within the Conservation Area, particularly with respect to layout, scale, form and materials and should include a landscape buffer to the heritage assets to the south of the site.</p>	Yes
A0348	B039	<p>Proposed Development Guidelines for the Former Ironbridge Power Station should:</p> <ul style="list-style-type: none"> <li>-Recognise Buildwas Abbey, as both a constraint and an opportunity to within the Masterplan. Engagement with English Heritage in discussions on this issue is important.</li> <li>-Require design and layout of the site should be informed by clear design guidance both of individual buildings and the overall structure of the development. This should be evidenced and informed by local character and also by an assessment of how setting contributes to the significance of the WHS, which should focus wider than just views, and recommendations included in the Policy Guidelines with respect to the design of urban realm, buildings, including roofing materials, heights, massing and lighting etc.</li> </ul>	<p>Noted. Proposed site guidelines proposed for the Former Ironbridge Power Station Site include the requirement to prepare a masterplan to inform the sites redevelopment. It is considered that this process is the appropriate mechanism to consider any necessary design guidance for the site. With regard to Buildwas Abbey, proposed site guidelines include that high-quality design and layout of the site will also reflect and respect the sites heritage, heritage assets on the site and its relationship with heritage assets within the wider area, which includes Buildwas Abbey (which is specifically referenced). As such it is considered that the need to consider the constraints and opportunities associated with Buildwas Abbey are already recognised within the draft site guidelines.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0349	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Not Specified	Yes	Yes	1. The Plan is largely considered sound, positively prepared, justified and consistent with national policy. Most of the policies are deliverable and flexible and therefore, the Plan should be effective. The exceptions are the site allocations within the river Clun catchment, Policy DP13 The Clun Catchment and the HRA Appropriate Assessment conclusions relating to the River Clun SAC. 2. Natural England can also confirm that they have been involved in discussions with the LPA during the Plan preparation process and with the Council as the HRA has emerged so they consider the Duty to Co-operate has been met.
A0349	B002	Habitats Regulations Assessment	Habitats Regulations Assessment Appropriate Assessment: River Clun SAC	Not Specified	Not Specified	Not Specified	1. Table 3 on page 33 shows that 232 dwellings are proposed within the Clun catchment, however in para 3.27 319 are proposed. 2. Paragraph 3.23 does not acknowledge that salmon and trout are essential to the life cycle of the pearl mussel as juvenile mussels are encysted within the gills of these fish. 3.Paragraphs 3.27 and 3.39: we agree that the allocation of 319 houses and an employment site will have an adverse effect on the integrity of the SAC without mitigation and that there are particular difficulties in applying nutrient neutrality principles in the river Clun catchment.
A0349	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Schedule S2.2(i) BKL008a	Not Specified	Not Specified	Yes	1. We welcome the Council's commitment (as set out in paragraph 3.30 of the HRA) to working with stakeholders to develop a restoration plan for the SAC with enough certainty of mitigation measures to unlock development. However, as NE does not yet know where any SAC restoration measures would be best located (para 3.29 of the HRA discusses the need to re-wild a percentage of the landscape) this site may be needed for these and thus it may be premature to include it as an allocation in the Local Plan. Also, this allocation may not be deliverable without additional work to inform the evidence underpinning the SAC restoration scheme. 2. Natural England notes that no acceptable nutrient neutrality or betterment schemes have been designed to date, to allow development to proceed, despite a planning application for 55 houses in Bishop's Castle having been in determination for more than a year. This lends credence to this allocation being premature. 3. We do not believe the allocation is compatible with the Dutch Nitrogen Judgement at the present stage, though you may wish to seek your own legal advice.
A0349	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Schedule S2.2(i) CLU005	Not Specified	Not Specified	No	1. We welcome the Council's commitment (as set out in paragraph 3.30 of the HRA) to working with stakeholders to develop a restoration plan for the SAC with enough certainty of mitigation measures to unlock development. However, as NE does not yet know where any SAC restoration measures would be best located (para 3.29 of the HRA discusses the need to re-wild a percentage of the landscape) this site may be needed for these and thus it may be premature to include it as an allocation in the Local Plan. Also, this allocation may not be deliverable without additional work to inform the evidence underpinning the SAC restoration scheme. 2. Natural England notes that no acceptable nutrient neutrality or betterment schemes have been designed to date, to allow development to proceed, despite a planning application for 55 houses in Bishop's Castle having been in determination for more than a year. This lends credence to this allocation being premature. 3. We do not believe the allocation is compatible with the Dutch Nitrogen Judgement at the present stage, though you may wish to seek your own legal advice.
A0349	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP13	No	No	Not Specified	1. In addition to the difficulties of applying the principle of nutrient neutrality in the River Clun catchment as set out in para 3.29 of the HRA (the need to re-wild a percentage of the landscape) this policy does not give enough detail to be certain of what is required to meet the requirement of nutrient neutrality or nutrient betterment. Although residential development generates less nitrogen than agricultural use, it could still contribute to the failure of the SAC through an in-combination effect. Additionally, the wording of the policy may have unintended consequences as landowners could apply higher levels of fertiliser to land in advance of applying for planning permission in order to reduce the requirements for mitigation measures linked to the development. 2. This policy may not be deliverable without additional work to inform the evidence underpinning the SAC restoration scheme. 3. We do not believe the policy is compatible with the Dutch Nitrogen Judgement at the present stage although you may want to seek your own legal advice. 4. The explanatory text to the policy is correct.
A0349	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Vision and Strategy	Not Specified	Not Specified	Not Specified	Natural England advises that the Plan's vision and emerging development strategy addresses impacts and opportunities for the natural environment. We note the aspiration to protect and enhance the environment and move towards a zero carbon economy. We note the Strategic Approach and while Natural England has no comment on the numbers of new dwellings required we support the approach overall.
A0349	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Not Specified	Not Specified	Not Specified	Climate Change Natural England supports this strategic policy for tackling climate change. All 4 parts of the policy are strongly supported by Natural England. Natural
A0349	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	Not Specified	Not Specified	Natural England also strongly supports DP11 Minimising Carbon Emissions.
A0349	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Not Specified	Not Specified	Not Specified	Natural England strongly supports this policy. It should provide protection to the most aspects of the natural environment we are pleased to see net gain has been incorporated into the plan, in our view this could contribute to significant improvements for biodiversity and contribute to wider environmental benefits such as clean air and water and to help restore, buffer and connect existing environmental assets. We look forward to working with your authority on the scheme as it develops
A0349	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP14	Not Specified	Not Specified	Not Specified	Natural England supports this policy. Well designed multi-functional green infrastructure contributes greatly to a number benefits both for people and nature. Your green infrastructure should dovetail with your biodiversity net gain strategies in order to maximise benefits.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0349	B001	n/a	Noted.	No
A0349	B002	none specified.	The Council's response to this representation is set out in the Statement of Common Ground with Natural England.	No
A0349	B003	none specified.	See the Statement of Common Ground with Natural England	No
A0349	B004	none specified.	See the Statement of Common Ground with Natural England	No
A0349	B005	none specified.	These comments are addressed in the Statement of Common Ground with EA	Yes
A0349	B006	n/a	Noted.	No
A0349	B007	n/a	Support welcomed.	No
A0349	B008	n/a	Response noted.	No
A0349	B009	n/a	Noted.	No
A0349	B010	n/a	Support welcomed	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0349	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18	Not Specified	Not Specified	Not Specified	Natural England supports this policy especially with regard to requirements for air quality assessments and consideration of tranquillity within the Shropshire Hills Area of Outstanding Natural Beauty (AONB).
A0349	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP24	Not Specified	Not Specified	Not Specified	Natural England welcomes the inclusion of a specific policy for the AONB. Great weight should be given to the comments of the AONB unit. You should also consider the setting of the AONB. Development in close proximity or adjacent to the AONB could have damaging impacts on the designated landscape.
A0349	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Sites of least Environmental Value	Not Specified	Not Specified	Not Specified	In accordance with the National Planning Policy Framework (NPPF), the plan's development strategy appears to avoid areas of high environmental value. Natural England notes the evidence in the HRA, which demonstrates that sites of least environmental value are allocated i.e. they avoid designated sites and landscapes. This is with the exception of the allocations within the catchment of the River Clun SAC as discussed in our other comments.
A0350	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>The proposed housing requirement (around 1,400 dwellings per annum) does not meet the Duty to Co-operate and fails the 'positively prepared' and 'consistent with national policy' tests of soundness as:</p> <ul style="list-style-type: none"> <li>-It represents a reduction of the 1,530 dwellings planned for within the adopted Core Strategy from 2021, failing to support Government's objective of 'boosting the supply' identified within para 59 of the National Planning Policy Framework (NPPF).</li> <li>-It is significantly lower than the 2018-based household projections which forecast an average growth of 1,656 households per annum (2016-2038), constraining growth rather than meeting need.</li> </ul> <p>Recognise it exceeds Local Housing Need (LHN) calculated using Government's standard methodology, but consider exceptional circumstances exist to justify an alternative approach which reflects current and future demographic trends and market signals (as per para 60 of the NPPF). Specifically the large difference between the 2014-based (which inform the standard method) and 2018-based household projections (24,241 households above the standard method estimate of 23,749 households) over the proposed Local Plan period (graph/table provided within representation). Covid-19 has increased growth/demand in Shropshire in 2020 and resultant shifts towards more internet-based working from home will continue this, as commuting considerations are replaced by quality of life.</p> <p>The level of under-provision will result in rising house prices as demand outstrips supply, worsening affordability (Shropshire already has an affordability ratio of higher than the average for the West Midlands and England (figure provided in representation) and expect this to increase given recent rapid house price rises), and failure to meet the 'positively prepared' test.</p> <p>The Association of Black Country Authorities (ABCA) have requested assistance in meeting unmet housing need (26,000 dwellings to 2038). Despite limited constraints/Green Belt, Shropshire have proposed only a 1,500 dwelling contribution. Consider this fails the duty to cooperate and para 60 of the NPPF, which requires unmet needs within neighbouring areas to be taken into account. No statement of common ground has been published with ABCA, contrary to para's 24-27 of the NPPF which requires their preparation and availability.</p>
A0350	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	No	Not Specified	<p>Consider draft Policy SP7 fails the 'justified', 'effective' and 'consistent with national policy' tests of soundness.</p> <p>It is 'not justified' as para 3 of draft Policy SP7 proposes that settlement guidelines are 'significant policy considerations'. Whilst the proposed supporting text to draft Policy SP7 notes these guidelines are not a ceiling to development, in practice operation of para 3 of draft Policy SP7 restricts the amount of development in identified sustainable settlements. No evidence is presented that these guidelines represent appropriate strategies, taking into account reasonable alternatives or that they represent a sustainable level of development (or that more would be unsustainable).</p> <p>It is 'not consistent with national policy' as applying settlement guidelines to restrict development is contrary to para 59 of the National Planning Policy Framework (NPPF) which seeks to boost the supply of housing and para's 60 and 73 of the NPPF regarding treating housing requirements as minimums.</p> <p>It is 'not effective' as in combination with draft Policy DP1 it will adversely impact on housing delivery by making proposed allocations undeliverable. This is because draft Policy SP7 limits housing numbers in a settlement and draft Policy DP1 seeks a higher proportion of smaller houses, effectively requiring more units on a site to achieve the same saleable floorspace (the Viability Study undertaken to inform the draft Shropshire Local Plan demonstrates that viability is finely balanced in many parts of the County (extract provided within representation), so saleable floorspace must be maximised), which will be difficult to achieve if doing so exceeds a settlement guideline.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0349	B011	n/a	Support welcomed.	No
A0349	B012	n/a	noted	No
A0349	B013	n/a	Noted.	No
A0350	B001	Increase the annual housing requirement to 2,300 dwellings (50,600 dwellings between 2016 and 2038). Starting point for this is the 2018-household projection average annual growth of 1,656 dwellings per annum, adds in the standard method's adjustment for the 2019 affordability ratio and adds 5,000 dwelling contribution to unmet cross-boundary need.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Government has recently consulted upon potential changes to the methodology for calculating LHN, including the potential use of the 2018-based sub-national household projections (SNHP). As a result of this consultation Government determined that it was most appropriate to retain the use of the 2014-based SNHP for this calculation. Furthermore, in responding to this Consultation, Shropshire Council indicated its significant concerns regarding the 2018-based SNHP, particularly with regard to their reliance on the 2018-based sub-national population projections (SNPP) which utilised only 2-years of internal migration data in their formulation. With regard to the adopted Local Plan housing requirement, it is important to note that this is an aspirational but achievable housing requirement, which exceeded past housing need calculations and continues to exceed calculations of LHN using Government's standard methodology. Furthermore, the housing requirement was phased into 5-year time periods (the average housing requirement over the total period covered by the adopted Local Plan is some 1,375 dwellings per annum). The draft Shropshire Local Plan also proposes an aspirational, but achievable housing requirement, which averages some 1,400 dwellings per annum, which meets identified LHN and provides an opportunity to respond/support other objectives as referenced above. Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. It is considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.	No
A0350	B002	Draft Policy SP7 should be modified to: -Under point 3, remove reference to 'significant' in relation to residential development guidelines. -Under point 3b, recognise the need to include a 20% non-delivery allowance in relation to outstanding commitments. -Under point 3, expand the list of considerations, in situations where a residential guideline would be exceeded, to include two new considerations, specifically the delivery of the housing mix sought in draft Policy DP1 and the viability and delivery of the plans allocated sites.	Noted. The purpose of the draft Shropshire Local Plan is to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations. However, draft Policy SP7 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such, draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline. As such, Shropshire Council considers that draft Policy SP7 is justified, effective and consistent with national policy. It is also considered that draft Policy DP1 is complementary in that it ensures the effective use of land and that the forms of housing delivered are responsive to the needs of local communities.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0350	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	<p>Support the statement in draft Policy SP8 that "Community Hubs are considered significant rural service centres and the focus for development within the rural area." However, section 1f of draft Policy SP8 contradicts this by imposing a ceiling on development, meaning the draft Policy fails the 'justified', 'positively prepared', and 'consistent with national policy' tests of soundness. As:</p> <ul style="list-style-type: none"> <li>-It is contrary to para 59 of the National Planning Policy Framework (NPPF) regarding significantly boosting the supply of homes.</li> <li>-If Community Hubs are intended to be the focus for development in rural areas they must accommodate both their own growth and that of their rural hinterland. If this is to be achieved, proposed residential guidelines should be a minimum of the average growth forecasts for Shropshire (equivalent to 1.22% per annum between 2016-2038 based on 2018-based sub-national household projections (SNHP)). But almost all proposed residential guidelines for Community Hubs are below this figure.</li> <li>-There is inadequate justification or evidence as to why successful and sustainable settlements should tip from a positive to negative approach to development, simply because they have exceeded an arbitrary guideline. This also contradicts the above statement regarding them being a focus for development in the rural area.</li> <li>-It repeats draft Policy SP7 and is therefore unnecessary.</li> </ul>
A0350	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	No	Not Specified	<p>Seriously concerned that draft Policy DP1 fails the 'effective' and 'justified' tests of soundness.</p> <ul style="list-style-type: none"> <li>-Particularly concerned about the 50 dwelling threshold proposed within section 6 of draft Policy DP1. The benefit of specialist housing is having a significant number of units in one location. Therefore, on sites of 50 dwellings the majority would need to be specialist housing to achieve necessary concentrations required by specialist housing models. Sites of 50-100 dwellings would be significantly impacted, are often in edge of settlement locations inappropriate for these types of units and unattractive to specialist housing providers, and general market developers would not be interested in acquiring them when specialist housing is an entirely different business model normally delivered by a different housing provider. In consequence, this section of draft policy DP1, mis-understands the nature of specialist housing, will greatly reduce housebuilder interest in medium-sized sites in Shropshire, and will seriously harm deliverability of the draft Shropshire Local Plan, meaning it fails the 'effective' test. Further, no evidence has been presented for the threshold, therefore the policy fails the 'justified' test of soundness.</li> <li>-Section 2b requires provision of smaller units. This may result in higher densities, in order to achieve sufficient saleable floorspace to make a development viable (the Viability Assessment undertaken to inform the draft Shropshire Local Plan finds a high-proportion of typologies are not viable with the residential mix and other policy requirements in the draft Shropshire Local Plan - the total burden on development is substantial (extract provided in representation)), altering local character (especially in low density areas). Pressure to achieve sufficient saleable floorspace will also result in pressure to exceed housing guidelines for proposed allocations and settlements, contrary to 'caps' in other draft policies and proposed allocation guidelines. This may render development unviable as flexibility is required to achieve sufficient saleable floorspace and to match housing provision to current market demand. Section 2b of draft Policy DP1 will create serious deliverability problems and cause the draft Shropshire Local Plan to fail the 'effective' test of soundness. It is also not 'justified', Para 4.5 of the proposed explanation to draft Policy DP1 refers to the Strategic Housing Market Assessment (SHMA) which translates household projections into housing need, however this confuses/over-simplifies 'need' and 'demand', as the majority want larger dwellings than need dictates and does not consider 'need' for home offices/guest room(s). Covid-19 highlights reasons larger dwellings are wanted. 3-bed dwellings are the most popular size, therefore a 25% requirement for 2-bed or less dwellings does not match demand, which is for larger dwellings.</li> </ul>
A0350	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Bayston Hill BAY005	Not Specified	No	Not Specified	<p>The proposed residential guideline for Bayston Hill in draft Policy S16.2 and the proposed priority of retaining a 'Green Gap' in para 5.229 of the proposed explanation for draft Policy S16.2 fail the 'positively prepared', 'justified' and 'effective' tests of soundness.</p> <ul style="list-style-type: none"> <li>-The housing requirement in draft Policy SP2 does not reflect latest housing projections and fails to meet objectively assessed housing need and is therefore unsound. Bayston Hill shares in this failure, it is the largest village in Shropshire and has a good range of services and significant local employment (second highest performing Community Hub within the Council's Hierarchy of Settlements Assessment (HoS)), but the level of annual growth proposed (0.45%) is significantly less than that proposed for Shropshire (1.01%). As such, the low settlement guideline for Bayston Hill fails the 'positively prepared' test of soundness.</li> <li>-In addition to the size and availability of services documented above, Bayston Hill is also located on the A49 strategic corridor and the proposed strategic approach responds to the Shropshire Economic Growth Strategy objective to prioritise investment into strategic corridors. But the annual rate of growth proposed (0.45%) is unjustifiably lower than other Community Hubs with similar scores in the HoS (1.03% for Pontesbury, 1.66% for St Martins, 1.1% for Clun and 1.2% for Gobowen), calling into question the basis for settlement growth figures. As such, the low settlement guideline for Bayston Hill fails the 'justified' test of soundness.</li> <li>-Para 5.229 of the explanation for draft Policy S16.2 refers to retention of a Green Gap between Shrewsbury and Bayston Hill, but there is no evidence to support this approach, as it does not feature in either the Shropshire Open Space and Recreation Needs Assessment (September 2018) or Green Infrastructure Strategy for Shrewsbury (July 2020) (extract provided in representation), as such it fails the 'justified' test of soundness. In contrast, land south of Bayston Hill is associated with Lyth Hill, crossed by many well-walked public rights of way and to the south and east of Bayston Hill are the South Shropshire Hills AONB (nationally recognised landscape designation). Further the Shropshire Council Landscape &amp; Visual Sensitivity Assessment (2018) identifies land to the south as more landscape and visually sensitive than land to the north (extract provided in representation). Also, consider the draft Shropshire Local Plan can do better than simply retaining a gap between Bayston Hill and Shrewsbury, by providing for improved recreation benefitting residents of Shrewsbury and Bayston Hill. This opportunity was previously recognised in the Shrewsbury and Atcham Local Plan (extract provided in representation). This could potentially be provided by private investment, through a strategy of actively promoting sites that will provide additional planting and new areas of public open space.</li> <li>-Site BAY005 promoted as a potential site allocation to deliver housing and attractive open space/landscaping (draft masterplan provided in representation). It is well located to access services and facilities (performing 'fair' within the site assessment) and is deliverable.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0350	B003	Remove para 1f of draft Policy SP8 entirely.	<p>Noted. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology.</p> <p>The purpose of the draft Shropshire Local Plan to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines for proposed Community Hubs have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations.</p> <p>Para 1f of Draft Policy SP8 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such where these residential development guidelines are to be exceeded it cross-references draft Policy SP7. Draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.</p>	No
A0350	B004	<p>The site size threshold for specialist housing referenced in para 6 of draft Policy DP1 should be increased to 500 dwellings.</p> <p>The threshold for 2-bedroom or less dwellings referenced within para 2b of draft Policy DP1 should be reduced to 10%.</p> <p>Para 2 of draft Policy DP1 should include a third approach to establishing an appropriate residential mix, specifically "the developer demonstrates a mix appropriate to market conditions and/or the site's characteristics."</p>	<p>Noted. Shropshire Council considers that draft Policy DP1 is justified, effective and consistent with national policy. It is also considered that other relevant draft policies are complementary.</p> <p>With regard to para 2 (including 2b) of draft Policy DP1, it is considered that this provides an appropriate balance between ensuring that new development will include an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry), and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand.</p> <p>The mix proposed within para 2b is informed by the Strategic Housing Market Assessment (SHMA) of the draft Shropshire Local Plan, which is considered a robust and proportionate assessment.</p> <p>With regard to para 6 of draft Policy DP1, the Strategic Housing Market Assessment (SHMA) indicates that growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the proposed Local Plan period from 2016 to 2038 and also identifies a specific need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision. With regard to specialist designed housing for older people, the National Planning Practice Guidance (NPPG) on Housing for Older People recognises that there is a significant amount of variability in the types of specialist accommodation for older people, identifying four main categories which can be summarised as: a. "Age-restricted general market housing; b. Retirement living or sheltered housing; c. Extra care housing or housing-with-care; and d. Residential care homes and nursing homes". Reflecting the need for and variety of types of specialist accommodation, it is considered that the threshold of 50 or more dwellings proposed within para 6 of draft Policy DP1. However, it is recognised that sites of 50 or more dwellings will be diverse in nature, as such a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors.</p>	No
A0350	B005	<p>Increase the proposed housing guideline for Bayston Hill to at least 445 dwellings.</p> <p>Include site BAY005 as a site allocation (proposed draft guidelines provided within representation).</p> <p>Seek to improve rather than protect the Green Gap between Shrewsbury and Bayston Hill.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council also considers that the proposed development strategy for Bayston Hill and the existing commitments, proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. The retention of the Green Gap between Shrewsbury and Bayston Hill is considered an appropriate policy consideration.</p> <p>Proposed site allocations have been informed by a robust and proportionate site assessment process, including consideration of the landscape and policy considerations such as retention of Green Gaps between settlements.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0350	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Bomere Heath BOM19 & BOM020	Not Specified	No	Not Specified	<p>Strongly support designation of Bomere Heath as a Community Hub, as it is a sustainable settlement with a good range of services and significant local employment. SAMDev Plan allocation BOM004 experienced very strong local demand and is now fully built out. Confident allocations BOM019 and BOM020, which form natural extensions of the village linking it to the football/cricket pitches (map provided in representation), will likewise be very popular and will be delivered quickly.</p> <p>Unfortunately site guidelines remain inaccurate, despite previous representations. Specifically:</p> <ul style="list-style-type: none"> <li>-The requirement for BOM019 to be accessed off Shrewsbury Road is unnecessary as the recently constructed roundabout access onto Shrewsbury Road (for an adjacent site) was designed to also accommodate traffic from this site (plans provided within representation).</li> <li>-Guidelines seek to duplicate an already provided pedestrian footway between the cricket/football pitches and village. This is unnecessary and fails the 'justified' test.</li> </ul> <p>Would also note that the adjacent site also included SUDs designed to also cater for BOM019 and BOM020.</p>
A0350	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.2 Alveley	Not Specified	No	Not Specified	<p>Strongly support designation of Alveley as a Community Hub and proposed changes to Green Belt boundaries (required for the long-term sustainability of the village). Alveley is a sustainable location to accommodate development in east Shropshire; is located on the A442 strategic transport corridor; has a good range of services, facilities, public transport links and local employment opportunities (including at Alveley Industrial Estate, allowing for balanced growth); access to the growing economies of Worcestershire/wider West Midlands; and there is a strong demand for housing in the local area.</p> <p>The level of development proposed (equivalent to 0.9% growth per annum over 20 years) is the minimum necessary to meet the village's housing needs, justifying the release of land from the Green Belt.</p> <p>Strongly support proposed allocation ALV009 for 35 dwellings. The site would be developed with a high-quality design and include a range of features including public open space (indicative layout forms an appendix to the representation).</p> <p>Within the Green Belt Review undertaken to inform the draft Shropshire Local Plan, the sub-parcel containing proposed allocation ALV009 was concluded to make only a limited contribution to the Green Belt and its development would result in one of the lowest harms to Green Belt. Within the Landscape and Visual Sensitivity Assessment undertaken to inform the draft Shropshire Local Plan, proposed allocation ALV009 was considered to have the lowest landscape and visual sensitivity.</p> <p>Unfortunately site guidelines could potentially cause deliverability problems that fail the 'effective' test of soundness, despite previous representations. Specifically:</p> <ul style="list-style-type: none"> <li>-The requirement for a footway along the A442 should be specifically on adopted highway land, given the limited space between third party land and the highway and the problems that can occur if third party land is involved.</li> <li>-It is necessary to recognise that the site's access will necessitate puncturing through the tree belt fronting the A442.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0350	B006	<p>Update the draft development guidelines for proposed allocation BOM019 to:</p> <ul style="list-style-type: none"> <li>-Reference access via the roundabout and associated road (Trinity View) which serves the adjacent development site, rather than access via Shrewsbury Road.</li> <li>-Recognise that a pedestrian footway has already been provided between the village and cricket/football pitch.</li> </ul>	<p>Noted. The current proposed guideline indicates that "an appropriate highway access will be provided off Shrewsbury Road". Should the current access be acceptable when assessed against the detail of a planning application, the policy does not stipulate that the access arrangements need to new. No change proposed.</p>	No
A0350	B007	<p>Update the draft development guidelines for proposed allocation ALV009 to:</p> <ul style="list-style-type: none"> <li>-Retain, where possible, protected and mature trees and hedgerows.</li> <li>-Recognise that the continuous footway along the A442 will be within adopted highway land.</li> </ul>	<p>Noted. Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable and deliverable.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0351	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S7.1	Not Specified	No	Not Specified	<p>Draft Policy S7.1 is unsound as:</p> <ul style="list-style-type: none"> <li>-The Viability Study (VS) undertaken to inform the draft Shropshire Local Plan (extracts provided in representation) concludes development in much of the county is not viable. Therefore, more housing should be delivered on viable types of site/viable locations, in order for the Plan to meet the 'justified' and 'effective' tests of soundness. This includes small greenfield sites in the more viable south of the county. Within the VS, Craven Arms is identified as being: located in the more viable south zone and between two settlements in the higher south zone; as having 3/4 bedroom house prices similar/higher than growth settlements such as Shrewsbury, Bridgnorth, Shifnal and Albrighton; and having house prices substantially higher than in the north.</li> <li>-Latest housing projections show a significant need for housing (there is a difference of some 24,241 household between the 2014-based (which inform the standard method) and 2018-based household projections (data provided in representation)), exacerbated by Covid-19 which has increased demand in Shropshire a trend which is likely to continue due to home working reducing commuting considerations. To ensure that the Plan is 'positively prepared' and 'justified', more sites are needed to ensure sufficient delivery to meet the County's housing needs and avoid affordability problems.</li> <li>-Craven Arms is a Key Centre located on the A49 strategic corridor, identified as a focus for growth in the strategic approach of the draft Shropshire Local Plan. As such it is well placed to help meet needs, as reflected in the 500 dwelling guideline proposed for the settlement, which is supported. However, to reflect the conclusions on the VS, a 25% non-delivery allowance should be applied across Shropshire, meaning sufficient land for 625 dwellings should be identified in Craven Arms.</li> <li>-Development in Craven Arms is reliant on SAMDev Plan allocations that have failed to be delivered (CRAV003 &amp; CRAV009 for 235 dwellings and CRAV024 for 25 dwellings do not yet have Planning Permission and the VS concluded that large greenfield sites such as CRAV003 &amp; CRAV009 are unviable) and there is no convincing evidence that they will be. In contrast CRAV002, has been built out and CRAV004 &amp; CRAV010 are currently being developed (other SAMDev Plan allocations). To meet the 'effective' test of soundness, additional allocations are needed.</li> </ul> <p>As such sites CRA023, CRA024 and CRA025 should be included as proposed allocations/within the proposed development boundary. These sites have been promoted throughout the Local Plan Review (see appendix to this representation); would represent natural extensions to the town/recent developments; are not subject to environmental constraints and offer opportunities for enhancement; are located on the west of the town which has a lower landscape and visual sensitivity than the east; could deliver a mix of sizes, types (including self-build and custom-build), tenures and affordability of housing; could be accessed off Watling Street - identified within the 'Craven Arms Development Brief' (appendix to this representation) which identifies the potential for an upgrade of Watling Street as part of a comprehensive scheme, including a new crossing of the railway line (community priority identified in the Place Plan), but could also deliver improvements to Watling Street including provision of a footway for pedestrians and appropriate road widening outside of it; and are highly deliverable (small sites consistent with the VS).</p>
A0351	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	Not Specified	No	Not Specified	<p>There are two types of housing that the draft Shropshire Local Plan will not deliver in sufficient quantity, namely:</p> <ul style="list-style-type: none"> <li>-Specialist housing to meet the needs of older people (the Strategic Housing Market Assessment (SHMA) indicates a need for 3,500 C3 specialist units and 2,500 C2 specialist units), as development boundaries are tight, no specific allocations are made for this form of housing and the draft Shropshire Local Plan only makes provision for it on large sites of 50 or more dwellings (draft Policy DP1). Unlikely allocated sites of 50-100 dwellings will deliver specialist housing as to do so, over 50% of the housing would need to be of this type (not normally built by general housing developers).</li> <li>-Self-build and custom-build housing (the SHMA identifies a need for 2,500 houses), as proposed development boundaries are tight and whilst draft Policy DP2 expects large sites to provide 10% of their plots as self-build, this is incompatible with housebuilders' business models and highly unlikely to be delivered.</li> </ul> <p>Problems in delivering/inadequate provision of the above two types of housing mean the Plan fails the 'effective' and 'positively prepared' (para 35a of the National Planning Policy Framework (NPPF) requires a strategy which as a minimum seeks to meet objectively assessed needs) tests of soundness for this type of housing. Draft Policy SP10 should allow for their provision in the countryside adjoining settlements.</p> <p>The principle of allowing development outside but adjoining development boundaries (where guidelines appear unlikely to be met) is accepted in section 4 of draft Policy SP7. It should not be necessary to wait until late in the Plan period to meet needs for specialist and self-build housing.</p>
A0352	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 BIT022	Not Specified	Not Specified	Not Specified	Agree with BIT022, but the housing guideline is too small given the site's size.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0351	B001	A larger number of smaller sites in higher value parts of the County should be included in the Plan as proposed allocations. Sites CRA023, CRA024 and CRA025 should either be identified as proposed allocations or included in an extended development boundary for Craven Arms.	The adopted Local Plan in the Site Allocations and Management of Development Plan (SAMDev Plan, 2015) set out an ambitious development strategy for Craven Arms. This strategy is proposed to be transferred in its entirety into the draft Shropshire Local Plan with the addition of a windfall allowance for 90 dwellings for further small sale housing development within the town in the period to 2038. This ambitious strategy will strengthen the role and function of Craven Arms as a Key Centre and a principal 'service' settlement for the adjoining rural areas particularly within the Shropshire Area of Outstanding Natural Beauty along the Clun/Kemp valley (west) and Corvedale (east). The strategy also reflects the location of Craven Arms on the strategic corridor of the A49 Trunk Road through south Shropshire and the proposed function of the town as a key growth point supporting the historic Market Town of Ludlow (south) and the historic Key Centre of Church Stretton. This also reflects the more commercial history and character of the centre and eastern areas of the town and Craven Arms situation as an important station stop on the Shrewsbury – Cardiff rail line at the junction with the Heart of Wales line serving mid-Wales. The town is also the business location for a key local employer (Euro Quality Lambs) that is looking to locate and expand from the centre of the town to a new bespoke site in the north of Craven Arms to create the Newington Food Park which is expected to drive the development of further employment sites allocated in the north of the town including the Phase 2 expansion of the successful Craven Arms Business Park. Shropshire Council and its partners, including Craven Arms Town Council, consider the proposed strategic approach to the level and distribution of development in Shropshire to be appropriate, effective, sustainable and deliverable including the allocations in the draft Local plan that have been saved from the currently adopted SAMDev Plan. These saved allocations in Craven Arms almost entirely comprise larger greenfield sites for which there should be a ready market and reasonable levels of viability to deliver the proposed development. It is recognised that the more commercial character of Craven Arms means that the market in this town is not as strong and resilient as the other historic towns on Ludlow and Church Stretton located on the a49 in south Shropshire. For the time being, the Brexit decision and the Covid-19 downturn have affected the delivery of the Craven Arms strategy. The strategy is also affected by further strategic infrastructure requirements to deliver a new strategic highway junction on the A49, a strategic highway link between the north and the west of the town, bridging the Shrewsbury-Cardiff rail line and serving the employment allocations to the north and the housing allocations in the west along the urban boundary on Watling Street between the town to the east and the open countryside and AONB to the west. The delivery of this strategic infrastructure will facilitate the closure of the key level crossing (at Long Lane) and avoid the proposed automation of this crossing that is expected to cause traffic delays and queues onto the A49 affecting the safe operation of this strategic Trunk Road that also serves commercial traffic crossing and serving Mid and North Wales. The Council is supporting a partnership of landowners and developers in Craven Arms to deliver this strategic infrastructure in order to help trigger the delivery of the development strategy for Craven Arms set out in the draft Shropshire Local Plan. Shropshire Council with the Craven Arms Town Council have considered whether to make further land allocations in the draft Local plan to help deliver the strategy by enhancing the viability of the overall scheme as suggested in the Craven Arms Development Brief submitted by a respondent to the draft Local Plan. The preferred strategy agreed with Craven Arms Town Council is to make a small windfall allowance for available for smaller developers to balance the larger development opportunities in the town and to help broaden the range, choice and affordability of new housing in the town up to 2038. It is also recognised that Watling Street forms a strong and defensible boundary to western areas of the town and separate the urban areas from the countryside and AONB that encloses the north and west of Craven Arms. Consequently, sites CRA015, CRA023, CRA024 and CRA025 are not considered to be necessary or sustainable additions to the development strategy for Craven Arms. These sites would also affect the setting of the settlements and heritage assets in the adjoining Sibdon Carwood Parish in a location previously only considered for development to deliver an exceptional affordable housing scheme referenced by the respondent proposing sites CRA015. Shropshire Council therefore consider the strategy for Craven Arms to be appropriate, effective, sustainable and deliverable without further allocations including sites CRA015, CRA023, CRA024 and CRA025.	No
A0351	B002	Para 4 of draft Policy SP10 should allow for: specialist housing such as retirement living or sheltered housing; extra care housing or housing-with-care; and residential care homes and nursing homes where there is a shortage of provision locally; and self-build and custom-build housing on suitable sites adjoining development boundaries.	Noted. SP10 reflects the Draft Plan strategy of achieving a sustainable and appropriate pattern of development through new development focused in the urban areas. Accordingly, a wide range of allocations and other opportunities are provided by the Draft Plan for all types of housing within settlements. In line with the Plan's strategy SP10 seeks to strictly control new market housing outside development boundaries. This reflects the approach set out in national policy which seeks to direct new housing development away from isolated rural locations to places where it will support the role of existing settlements and their communities. Affordable housing exception schemes in appropriate locations are enabled by a range of policies in the draft Plan as sustainable housing solutions to meet recognised local housing needs. Recognised local needs can of course include specialist affordable housing, including appropriate types of accommodation for older persons encompassing both C2/C3 use classes. Single Pot Exception Policy DP6 provides a mechanism for affordable self-build dwellings. DP1 makes provision for specialist older person accommodation in settlements in a way which is integrated with broader market provision in communities, recognising the benefits of access to services and facilities, including healthcare, which may be less accessible in countryside locations. As such it is considered that allowing open market self build or older person accommodation in the countryside is unnecessary and would undermine the proposed strategic approach within the draft Shropshire Local Plan and the plan led approach to managing development in Shropshire.	No
A0352	B001	The proposed allocation site BIT022 should have an increased housing provision of a minimum of 30 dwellings.	Shropshire Council considers the proposed capacity of BIT022 is appropriate. It should be noted that Para 4 of Draft Policy S16.2 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0353	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and Schedule SP2.2	Not Specified	No	Not Specified	<p>The list of Community Hubs in Schedule SP2.2 fails the 'justified', 'effective' and 'consistent with national policy' tests of soundness, as:</p> <ul style="list-style-type: none"> <li>-The methodology for identifying Community Hubs is fatally flawed by its lack of consideration for population size. Para 3.54 of the draft Shropshire Local Plan states Community Hubs have been identified based on size of population/number of dwellings and services and facilities. However size of population/number of dwellings is only used to screen-out settlements within the Hierarchy of Settlements (HoS) assessment. This means Community Hubs vary significantly in size and some settlements much larger than proposed Community Hubs are not themselves proposed as Community Hubs (Westbury and Cockshutt are not proposed Community Hubs but have populations of 659 and 859 respectively, whilst the proposed Community Hubs of Knockin and Longden has populations of 181 and 332 respectively. A wider table and graph is provided in the representation). As such consider para 3.54 is disingenuous. Agree that the significance of a rural settlement is not entirely related to services. Population size also matters, as the social and cultural function is closely related to population size and social/economic networks. As such suggest points should be awarded in the HoS to reflect the size of a settlement (suggest 1 point for each 100 people). This would ensure the methodology accounts for population, making it more rounded as a measure of community sustainability, ignoring it means the draft Shropshire Local Plan fails the 'justified' test of soundness.</li> <li>-There are many errors in the HoS, meaning proposed Community Hubs are not supported by accurate evidence and fails the 'justified' test of soundness. Of particular concern is Westbury, which should have additional points for multiple outdoor sports facilities (Westbury Recreation ground and the former school field); the presence of an amenity green space (Westbury Recreation Ground); and multiple significant employment provision (Nigel Farr Farm Services, Westbury Special Education Needs School and G O Davies (Westbury) Ltd). Details are provided within Appendix 1 of the Representation.</li> <li>-Following the Covid-19 pandemic, many settlements have lost services and facilities. As such the HoS no longer reflects reality on the ground.</li> <li>-Para 3.55 and para 3.56 of the draft Shropshire Local Plan advises that Community Hubs are significant rural services centres that are widely distributed across Shropshire. Every rural area has a social centre, however Figure SP2.1 shows gaps across the County where local centres are missing, such as west of Shrewsbury (some Parish Councils have not opted-in as Community Clusters). This results in a lack of rural focal points for development, likely to threaten viability of local shops and services over time. This is contrary to para 78 of the National Planning Policy Framework (NPPF). Failure to identify Westbury as a rural centre fails the consistent with national policy' test of soundness.</li> <li>-The Viability Study undertaken to inform the draft Shropshire Local Plan (VS) finds that the majority of site typologies are unviable and suggests more small sites are sought for site allocations (according to the VS, only 0.8% of dwellings are on proposed greenfield allocations for up to 9 dwellings). Given these typologies are considered most viable, this is a fundamental flaw of the draft Shropshire Local Plan that means it fails the 'effective' test of soundness. Confirmation from site promoters should be treated with scepticism as any allocated site will claim to be viable, if the alternative may result in it being de-allocated.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0353	B001	<p>Include 'points' within the Hierarchy of Settlements (HoS) assessment to reflect the population size of a settlement. Updated the proposed Community Hubs to reflect this updated assessment.</p> <p>Correct the HoS assessment for Westbury.</p> <p>Include Westbury as a proposed Community Hub in the draft Shropshire Local Plan to provide a rural focus for development west of Shrewsbury. Make necessary associated corrections to the draft Shropshire Local Plan.</p> <p>Include additional small-sized allocations for land of less than 10 dwellings in the most viable locations such as villages. This could be achieved through additional Community Hubs.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Westbury. As such it is considered appropriate that Westbury is not identified as a proposed Community Hub.</p> <p>Within the HoS, the size of a settlements population/number of dwellings are specifically considered within Stage 2: Screening of Settlements, whilst provision of services and facilities; high speed broadband; employment opportunities; and public transport links are specifically considered within Stage 3: Assessment of Screened-In Settlements. This is considered an appropriate methodology by which to identify Community Hubs, which are considered significant rural service centres.</p> <p>With regard to Westbury:</p> <p>-Within the HoS consideration of open space is primarily informed by the Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Within this Open Space Needs Assessment two outdoor sports facilities were identified in and around Westbury, however one was excluded from the assessment as it was a dedicated school facility (consistent with the HoS methodology). Whilst this primary school has since closed, this facility is now used as a special education needs school, as such the associated outdoor sports facility remains a dedicated school facility. Within this Open Space Needs Assessment, no amenity green space is identified in or around Westbury, rather Westbury Recreation Ground is identified as an outdoor sports facility (and included within the assessment as such).</p> <p>-Within the HoS both Nigel Farr Farm Services and G O Davies (Westbury) Ltd were considered within the assessment of significant employment opportunities. However, whilst it was concluded that G O Davies (Westbury) Ltd represented a significant employment opportunity as defined within the HoS (and is included within the HoS as such), it was concluded that Nigel Farr Farm Services did not constitute a significant employment opportunity as defined within the HoS. Westbury Special Education Needs School is also not considered to constitute a significant employment opportunity as defined within the HoS.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0353	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2	Not Specified	No	Not Specified	<p>See A0353 B001.</p> <p>Consider the correct Hierarchy of Settlements Assessment (HoS) points score for Westbury is some 52, which exceeds the threshold for Community Hub status. As such, the draft Shropshire Local Plan is unsound as Westbury has not been identified as a proposed Community Hub.</p> <p>Based on consideration of the correct HoS score and population size (in comparison with other proposed Community Hubs - table provided within representation), consider a residential guideline of around 60 dwellings would be appropriate.</p> <p>Most of the central and western portions of Westbury lie within the conservation area (map provided within representation). However, sites WEY006 and WEY019 (site plan appended to representation) to the east of the town are unconstrained (arboricultural and ecological reports have previously been submitted and a suitable access can be established off Shrewsbury Road (plan provided as appendix to representation).</p>
A0354	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>Welcome the new draft Shropshire Local Plan, but consider it currently fails all four tests of soundness in relation to older persons' accommodation in relation to draft Policies SP2, DP1, SP9 and S16.1, as:</p> <ul style="list-style-type: none"> <li>-Neither draft Policy SP2 or any other draft policy sets a target for provision of specialist housing for the elderly or specifically seek to meet this identified need, despite the clear and acknowledged (para 4.20 of the draft Shropshire Local Plan) need, as such it is not 'positively prepared'.</li> <li>-The draft Shropshire Local Plan evidence base illustrates Shropshire's ageing population profile (particularly the Strategic Housing Market Assessment (SHMA) which is summarised in Para 4.40 of the draft Shropshire Local Plan as identifying a need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision), as do the 2018-based household projections (which forecasts higher growth of the elderly than the 2016-based household projections that underpin the SHMA (the majority in the 75-84 and 85+ age groups) - table provided summarising difference within representation). However the draft Shropshire Local Plan makes no specific provision to deliver housing to meet this need, apart from a proposed requirement to provide an appropriate mix of housing within draft Policy DP1. This is inadequate (particularly given the challenges identified in Para 4.20 of the draft Shropshire Local Plan) and will not deliver the quantity or quality of older persons' housing needed in Shropshire. As such it is 'not justified'.</li> <li>-The draft Shropshire Local Plan will fail to deliver sufficient specialist housing and as such is not 'effective' at meeting needs for older persons accommodation. Policy DP1 encourage older persons' housing on sites of 50 or more dwellings, but is unlikely to fully meet Shropshire's needs for this type of housing, due to the limited number of large developments. Schedule A7 of the draft Shropshire Local Plan identifies 76 allocations, of which 36 are for 50+ dwellings. However, 20 of these are for up to 100 dwellings and as such unlikely to make significant contributions amongst the normal housing mix, leaving only 16 sites to make any significant contribution to the need for at least 6,000 units. Furthermore, few of the promoters of proposed allocations have provided evidence they will make significant specialist housing provision on what are largely general housing sites. Quantity and quality of units needed will only be delivered if the proposed approach is supplemented by specialist housing allocations and includes support for 100% specialist housing sites.</li> <li>-Para 61 of the National Planning Policy Framework (NPPF) states the size, type and tenure of housing for different groups in the community (including older people) should be assessed and reflected in policy. National Planning Practice Guidance (NPPG) supports this and also encourages specific allocations for specialist housing and a positive approach to 100% specialist housing. However, the draft Shropshire Local Plan does not include a specific targets for specialist housing within its policies and does not allocate any sites specifically for this purpose. As such it is not consistent with national policy in failing to adequately plan for this category of housing.</li> </ul>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0353	B002	<p>Include Westbury as a proposed Community Hub in the draft Shropshire Local Plan. Identify a proposed residential guideline for Westbury of around 60 dwellings and include two proposed allocations (WEY006 for 20 dwellings and WEY019 for 30 dwellings, proposed site guidelines provided within representation) to contribute to achieving this proposed residential guideline.</p> <p>The draft Policies Map should be amended to show a development boundary around Westbury, extending the village development boundary eastwards along Shrewsbury Road/B4386 Roman Road to include sites WEY006 and WEY019 (map provided as an appendix to the representation).</p> <p>Make necessary associated corrections to the draft Shropshire Local Plan.</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Westbury. Consequently, it is considered appropriate that Westbury is not identified as a proposed Community Hub and it is not proposed to identify a development guideline, development boundary or identify proposed allocations - consistent with other rural settlements considered countryside for policy purposes. Within the HoS, the size of a settlements population/number of dwellings are specifically considered within Stage 2: Screening of Settlements, whilst provision of services and facilities; high speed broadband; employment opportunities; and public transport links are specifically considered within Stage 3: Assessment of Screened-In Settlements. This is considered an appropriate methodology by which to identify Community Hubs, which are considered significant rural service centres. With regard to Westbury:</p> <p>-Within the HoS consideration of open space is primarily informed by the Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Within this Open Space Needs Assessment two outdoor sports facilities were identified in and around Westbury, however one was excluded from the assessment as it was a dedicated school facility (consistent with the HoS methodology). Whilst this primary school has since closed, this facility is now used as a special education needs school, as such the associated outdoor sports facility remains a dedicated school facility. Within this Open Space Needs Assessment, no amenity green space is identified in or around Westbury, rather Westbury Recreation Ground is identified as an outdoor sports facility (and included within the assessment as such).</p> <p>-Within the HoS both Nigel Farr Farm Services and G O Davies (Westbury) Ltd were considered within the assessment of significant employment opportunities. However, whilst it was concluded that G O Davies (Westbury) Ltd represented a significant employment opportunity as defined within the HoS (and is included within the HoS as such), it was concluded that Nigel Farr Farm Services did not constitute a significant employment opportunity as defined within the HoS. Westbury Special Education Needs School is also not considered to constitute a significant employment opportunity as defined within the HoS.</p> <p>With regard to the Proposed Development Sites:</p> <p>- Sites WEY006 and WEY019 are located to the east of the village on the Shrewsbury Road giving access to the Shropshire side of the village with the west side being located closer to the Welsh border. The two sites are located some distance from the route of the Westbury Brook and the sites themselves are situated outside the worst affected flood risk areas in Westbury albeit WEY019 has some lower lying areas affected by surface water flooding.</p> <p>- WEY006 does have a primary road frontage and is located close to some of the principal services in Westbury. WEY006 also does not have any flood risks within the site and WEY006 might be considered suitable for development. WEY006 has not been identified for development because the site has not been subject to a detailed site assessment and comparison with other potential development opportunities and Westbury is not proposed to be designated as a Community Hub.</p> <p>- WEY019 is a larger site than WEY006 and is located to the rear of WEY006 but still with reasonable access to the principal services but in a more isolated location. WEY019 does not have a direct access from the primary road network through the village being accessed along a narrow lane already serving the special needs school in the former primary school campus. WEY019 and the service lane would also be serviced through some of the flood affected areas on the primary road network through Westbury with some isolated surface water flooding affecting parts of WEY019 itself. WEY019 has not been identified for development because the site has not been subject to a detailed site assessment and comparison with other potential development opportunities and Westbury is not proposed to be designated as a Community Hub.</p>	No
A0354	B001	<p>A target for provision should be identified in draft policy SP2. This should state: Over the plan period, at least 3,500 units of additional specialist older persons accommodation (class C3) and 2,500 extra units of residential care provision (class C2) will be delivered.</p>	<p>Noted. It is considered that the draft policies within the draft Shropshire Local Plan, set a clear approach for addressing housing need in Shropshire. This includes the needs of specific groups within the community, including older people. As such, it is not considered necessary (nor is it considered a requirement of national policy), to identify specific targets for the provision of older persons accommodation within draft Policy SP2.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0354	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	Not Specified	No	Not Specified	<p>Welcome the new draft Shropshire Local Plan, but consider it currently fails all four tests of soundness in relation to older persons' accommodation in relation to draft Policies SP2, DP1, SP9 and S16.1, as:</p> <ul style="list-style-type: none"> <li>-Draft policies do not set a target for provision of specialist housing for the elderly or specifically seek to meet this identified need, despite the clear and acknowledged (para 4.20 of the draft Shropshire Local Plan) need, as such it is not 'positively prepared'.</li> <li>-The draft Shropshire Local Plan evidence base illustrates Shropshire's ageing population profile (particularly the Strategic Housing Market Assessment (SHMA) which is summarised in Para 4.40 of the draft Shropshire Local Plan as identifying a need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision), as do the 2018-based household projections (which forecasts higher growth of the elderly than the 2016-based household projections that underpin the SHMA (the majority in the 75-84 and 85+ age groups) - table provided summarising difference within representation). However the draft Shropshire Local Plan makes no specific provision to deliver housing to meet this need, apart from a proposed requirement to provide an appropriate mix of housing within draft Policy DP1. This is inadequate (particularly given the challenges identified in Para 4.20 of the draft Shropshire Local Plan) and will not deliver the quantity or quality of older persons' housing needed in Shropshire. As such it is 'not justified'.</li> <li>-The draft Shropshire Local Plan will fail to deliver sufficient specialist housing and as such is not 'effective' at meeting needs for older persons accommodation. Policy DP1 encourage older persons' housing on sites of 50 or more dwellings, but is unlikely to fully meet Shropshire's needs for this type of housing, due to the limited number of large developments. Schedule A7 of the draft Shropshire Local Plan identifies 76 allocations, of which 36 are for 50+ dwellings. However, 20 of these are for up to 100 dwellings and as such unlikely to make significant contributions amongst the normal housing mix, leaving only 16 sites to make any significant contribution to the need for at least 6,000 units. Furthermore, few of the promoters of proposed allocations have provided evidence they will make significant specialist housing provision on what are largely general housing sites. Quantity and quality of units needed will only be delivered if the proposed approach is supplemented by specialist housing allocations and includes support for 100% specialist housing sites.</li> <li>-Para 61 of the National Planning Policy Framework (NPPF) states the size, type and tenure of housing for different groups in the community (including older people) should be assessed and reflected in policy. National Planning Practice Guidance (NPPG) supports this and also encourages specific allocations for specialist housing and a positive approach to 100% specialist housing. However, the draft Shropshire Local Plan does not include a specific targets for specialist housing within its policies and does not allocate any sites specifically for this purpose. As such it is not consistent with national policy in failing to adequately plan for this category of housing.</li> </ul>
A0354	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	No	Not Specified	<p>Welcome the new draft Shropshire Local Plan, but consider it currently fails all four tests of soundness in relation to older persons' accommodation in relation to draft Policies SP2, DP1, SP9 and S16.1, as:</p> <ul style="list-style-type: none"> <li>-Draft policies do not set a target for provision of specialist housing for the elderly or specifically seek to meet this identified need, despite the clear and acknowledged (para 4.20 of the draft Shropshire Local Plan) need, as such it is not 'positively prepared'.</li> <li>-The draft Shropshire Local Plan evidence base illustrates Shropshire's ageing population profile (particularly the Strategic Housing Market Assessment (SHMA) which is summarised in Para 4.40 of the draft Shropshire Local Plan as identifying a need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision), as do the 2018-based household projections (which forecasts higher growth of the elderly than the 2016-based household projections that underpin the SHMA (the majority in the 75-84 and 85+ age groups) - table provided summarising difference within representation). However the draft Shropshire Local Plan makes no specific provision to deliver housing to meet this need, apart from a proposed requirement to provide an appropriate mix of housing within draft Policy DP1. This is inadequate (particularly given the challenges identified in Para 4.20 of the draft Shropshire Local Plan) and will not deliver the quantity or quality of older persons' housing needed in Shropshire. Draft Policy DP1's focus on housing mix considers only the mix of new build developments. It appears blind to the overall mix of housing in a local area, namely the combination of the new and existing housing stock. Where a planning application is received for a 100% specialist housing scheme to help re-balance the local housing stock, draft Policy DP1 does not provide any guidance on how such planning applications will be considered. Unless there is specific policy support, specialist housing has to compete with general market housing when acquiring sites. To significantly boost provision requires positive policies in the Local Plan that enable specialist housing to obtain planning consent in locations barred to more profitable family housing. There is also no justification for why the needs can be met entirely on large sites. As such it is 'not justified'.</li> <li>-The draft Shropshire Local Plan will fail to deliver sufficient specialist housing and does not help delivery on smaller sites, as such is not 'effective' at meeting needs for older persons accommodation. Policy DP1 encourage older persons' housing on sites of 50 or more dwellings, but is unlikely to fully meet Shropshire's needs for this type of housing, due to the limited number of large developments. Schedule A7 of the draft Shropshire Local Plan identifies 76 allocations, of which 36 are for 50+ dwellings. However, 20 of these are for up to 100 dwellings and as such unlikely to make significant contributions amongst the normal housing mix, leaving only 16 sites to make any significant contribution to the need for at least 6,000 units. Furthermore, few of the promoters of proposed allocations have provided evidence they will make significant specialist housing provision on what are largely general housing sites. Quantity and quality of units needed will only be delivered if the proposed approach is supplemented by specialist housing allocations and includes support for 100% specialist housing sites.</li> <li>-Para 61 of the National Planning Policy Framework (NPPF) states the size, type and tenure of housing for different groups in the community (including older people) should be assessed and reflected in policy. National Planning Practice Guidance (NPPG) supports this and also encourages specific allocations for specialist housing and a positive approach to 100% specialist housing. However, the draft Shropshire Local Plan does not include a specific targets for specialist housing within its policies, does not allocate any sites specifically for this purpose and is silent on Planning Applications for specialist housing not part of a larger site. As such it is not consistent with national policy in failing to adequately plan for this category of housing.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0354	B002	<p>Para 4 of draft Policy SP10, which identifies forms of residential development in the countryside which will be positively considered (where they meet all relevant requirements of Local Plan policies), should include an additional form, specifically: specialist housing such as retirement living or sheltered housing; extra care housing or housing-with-care; and residential care homes and nursing homes where there is a shortage of provision locally.</p>	<p>It is considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically:</p> <ul style="list-style-type: none"> <li>-Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings. The draft policy thus makes provision for specialist older person accommodation in settlements in a way which is integrated with broader market provision in communities, recognising the benefits of access to services and facilities, including healthcare, which may be less accessible in countryside locations.</li> <li>-Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people.</li> <li>-Draft Policy SP10, in line with the Plan's strategy, seeks to strictly control new market housing outside development boundaries. This reflects the approach set out in national policy which seeks to direct new housing development away from isolated rural locations to places where it will support the role of existing settlements and their communities. Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation.</li> </ul> <p>As such it is considered that allowing open market older person accommodation in the countryside is unnecessary and would undermine the proposed strategic approach within the draft Shropshire Local Plan and the plan led approach to managing development in Shropshire.</p>	No
A0354	B003	<p>Draft Policy DP1 should specify that: specialist housing developments will be considered positively on sites within settlement development boundaries. Where there is a shortage of specialist housing relative to recognised needs, proposals outside but adjoining development boundaries will be considered positively.</p>	<p>It is considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically:</p> <ul style="list-style-type: none"> <li>-Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings.</li> <li>-Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people.</li> <li>-Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation.</li> </ul>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0354	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 (SHR216a)	Not Specified	No	Not Specified	<p>If the need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision) is divided among the towns in proportion to their proposed settlement housing targets, Shrewsbury with 28% of the county's housing provision would need to deliver 980 specialist C3 units and 700 specialist C2 units. However, Policy S16.1 and associated proposed site allocations make no specific provision.</p> <p>Welcome the new draft Shropshire Local Plan, but consider it currently fails all four tests of soundness in relation to older persons' accommodation in relation to draft Policies SP2, DP1, SP9 and S16.1, as:</p> <ul style="list-style-type: none"> <li>-Draft policies do not set a target for provision of specialist housing for the elderly or specifically seek to meet this identified need, despite the clear and acknowledged (para 4.20 of the draft Shropshire Local Plan) need and fail to meet the needs for specialist housing for the elderly in Shrewsbury, as such it is not 'positively prepared'.</li> <li>-The draft Shropshire Local Plan evidence base illustrates Shropshire's ageing population profile (particularly the Strategic Housing Market Assessment (SHMA) which is summarised in Para 4.40 of the draft Shropshire Local Plan as identifying a need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision), as do the 2018-based household projections (which forecasts higher growth of the elderly than the 2016-based household projections that underpin the SHMA (the majority in the 75-84 and 85+ age groups) - table provided summarising difference within representation). However the draft Shropshire Local Plan makes no specific provision to deliver housing to meet this need, apart from a proposed requirement to provide an appropriate mix of housing within draft Policy DP1. This is inadequate (particularly given the challenges identified in Para 4.20 of the draft Shropshire Local Plan) and will not deliver the quantity or quality of older persons' housing needed in Shropshire. As such it is 'not justified'.</li> <li>-The draft Shropshire Local Plan will fail to deliver sufficient specialist housing and as such is not 'effective' at meeting needs for older persons accommodation, neither across Shropshire or in Shrewsbury. Policy DP1 encourage older persons' housing on sites of 50 or more dwellings, but is unlikely to fully meet Shropshire's needs for this type of housing, due to the limited number of large developments. Schedule A7 of the draft Shropshire Local Plan identifies 76 allocations, of which 36 are for 50+ dwellings. However, 20 of these are for up to 100 dwellings and as such unlikely to make significant contributions amongst the normal housing mix, leaving only 16 sites to make any significant contribution to the need for at least 6,000 units. Furthermore, few of the promoters of proposed allocations have provided evidence they will make significant specialist housing provision on what are largely general housing sites. Quantity and quality of units needed will only be delivered if the proposed approach is supplemented by specialist housing allocations and includes support for 100% specialist housing sites.</li> <li>-Para 61 of the National Planning Policy Framework (NPPF) states the size, type and tenure of housing for different groups in the community (including older people) should be assessed and reflected in policy. National Planning Practice Guidance (NPPG) supports this and also encourages specific allocations for specialist housing and a positive approach to 100% specialist housing. However, the draft Shropshire Local Plan does not include a specific targets for specialist housing within its policies, does not allocate any sites specifically for this purpose and is silent on Planning Applications specifically for specialist housing. As such it is not consistent with national policy in failing to adequately plan for this category of housing.</li> </ul> <p>Site SHR216a should be allocated specifically for a specialist retirement village comprising a range of types of older persons' housing including bungalows, assisted living and extra care housing, located opposite the recent development of retirement flats at Shire Living on Holyhead Road (Location and draft Layout Plans alongside an explanation/justification for the proposed allocation provided as an Appendix to the representation), to meet the identified need in Shrewsbury. Retirement villages are a successful model providing opportunities for residents to move from more independent accommodation to more supported accommodation as their needs change and also provides services for resident and the wider community. It is well served by public transport, benefits from good access to the countryside, is well screened in the landscape, is entirely outside the source protection zone and drainage will have no impact on it, and benefits from an existing access. The site is in proximity of existing facilities/complementary services on Clayton Way (Severn Hospice and Marches Care Home), Isle Court Nursing Home in Bicton and Shrewsbury Hospital. It is also compatible/natural extension to the Shrewsbury West SUE allocation (including existing health/care element).</p>
A0355	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>Para 2 of draft Policy SP2 undermines aspirations to accommodate investment and new development that contributes to meeting needs and making settlements more sustainable, as it proposes only 1,400 dwellings per annum. This is significantly less than the average 1,656 households per annum estimated over the proposed Plan period within latest official statistics (table provided in representation which compares latest household projections with those underpinning Governments standard method for calculating housing need). As such draft Policy SP2 will constrain growth rather than meet housing need and fails the 'positively prepared' test of soundness.</p> <p>Consider that the significant difference between the latest household projections (2018) and those that underpin Governments standard housing need calculation (2014) (171,876 households compared to only 137,635 households by the end of the proposed Local Plan period) represents exceptional circumstances to justify a departure from Governments standard method for calculating housing need - to avoid a very significant difference between the number of dwellings and the county's growing number of households.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0354	B004	<p>If the need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision) is divided among the towns in proportion to their proposed settlement housing targets, Shrewsbury with 28% of the county's housing provision would need to deliver 980 specialist C3 units and 700 specialist C2 units. However, Policy S16.1 and associated proposed site allocations make no specific provision. To make the draft Shropshire Local Plan sound, site SHR216a should be allocated specifically for a specialist retirement village comprising a range of types of older persons' housing including bungalows, assisted living and extra care housing, located opposite the recent development of retirement flats at Shire Living on Holyhead Road (Location and draft Layout Plans alongside an explanation/justification for the proposed allocation provided as an Appendix to the representation), to meet the identified need.</p> <p>Allocation of SHR216a would also require associated changes to the proposed Policies Map (example provided as an Appendix to the representation) and Schedule S16.1(i) (example provided within the representation).</p>	<p>Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>It is considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate for both Shropshire and Shrewsbury. Specifically:</p> <ul style="list-style-type: none"> <li>-Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings.</li> <li>-Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people.</li> <li>-Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation.</li> </ul>	No
A0355	B001	<p>Modify para 2 of draft Policy SP2 to increase the proposed housing requirements to at least 36,432 dwellings and the annual housing requirement to some 1,656 dwellings.</p> <p>Modify para 6 of draft Policy SP2 to specify that growth in urban areas will be complemented by appropriate new development 'and visionary rural transformation' within Community Hubs.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Government has recently consulted upon potential changes to the methodology for calculating LHN, including the potential use of the 2018-based sub-national household projections (SNHP). As a result of this consultation Government determined that it was most appropriate to retain the use of the 2014-based SNHP for this calculation. Furthermore, in responding to this Consultation, Shropshire Council indicated its significant concerns regarding the 2018-based SNHP, particularly with regard to their reliance on the 2018-based sub-national population projections (SNPP) which utilised only 2-years of internal migration data in their formulation.</p> <p>It is also considered that references to Community Hubs within draft Policy SP2 are appropriate and consistent with the wider approach to managing development within Community Hubs within the wider policies of the draft Shropshire Local Plan.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0355	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	Support the statement in draft Policy SP8 that "Community Hubs are considered significant rural service centres and the focus for development within the rural area." However, section 1f of draft Policy SP8 contradicts this by imposing a ceiling on development, meaning the draft Policy fails the 'justified', 'positively prepared', and 'consistent with national policy' tests of soundness. As: -There is inadequate justification or evidence as to why successful and sustainable settlements should tip from a positive to negative approach to development, simply because they have exceeded an arbitrary guideline. This also contradicts the above statement regarding them being a focus for development in the rural area. -Proposed Community Hubs have residential guidelines less than the Office of National Statistics' latest projected household growth figures for Shropshire (2018-based figures). So keeping development below settlement guideline figures does not seek to meet growth needs of rural areas and results in the policy failing the 'positively prepared' test of soundness. -It is contrary to para 59 of the National Planning Policy Framework (NPPF) regarding significantly boosting the supply of homes. -It repeats draft Policy SP7 and is therefore unnecessary.
A0355	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	Not Specified	No	Not Specified	Overall, support the positive approach in sections 2 and 3 of draft Policy SP10 to economic and community development in the countryside and welcome enablement of a wide range of uses that will strengthen rural sustainability. However, section 3a restricts new economic development to "small-scale", this fails the 'justified', 'effective' and 'consistent with national policy' tests of soundness, as: -National policy does not limit rural economic development to small-scale, rather Section 6 of the National Planning Policy Framework (NPPF) seeks to support a prosperous rural economy and Para 83 of the NPPF relates to policy/decision making in relation to various forms of development in rural areas, including 'all types of business'. -Sections 3b and 3c do not impose similar size restrictions on existing businesses and land-based businesses, so there is no justification for doing so for new businesses. -The restriction is unnecessary, given the draft policy requires economic development to "maintain or enhance countryside vitality and character". Section 4d of draft Policy SP10 permits sustainable re-use of buildings with heritage significance, but wording is so 'tight' it renders renovation unviable and impractical in most cases. Specifically it requires "minimal alteration, extension or rebuilding", greatly limiting flexibility necessary to make renovation schemes worthwhile - little point if a building cannot be brought up to modern standards which in most cases involves some alterations/extensions to the original building, which can be done sympathetically to provide a successful mix of original and modern. Intention of section 4d is to achieve, "optimum viable and sustainable reuse of buildings with heritage significance" but restrictions render it ineffective and fail the 'effective' test of soundness.
A0355	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	Not Specified	No	Not Specified	Welcome proposed use of Whole Estate Plans as a material consideration in draft Policy SP15, but concerned wording renders it ineffective and fails the 'justified', 'effective' and 'consistent with national policy' tests of soundness, as the requirement for the objectives, policies and land use proposals of Whole Estate Plans to be consistent with the objectives and policies of the draft Shropshire Local Plan for it to be considered a material planning consideration: -Renders Whole Estate Plan's marginal in terms of added value in the planning process, will result fewer coming forward, make them of low value and as such renders the policy ineffective. -Para 3.153 of the explanation notes Whole Estate Plans may add value to decision making but do not replace the primacy of the Local Plan. Do not disagree, but planning law allows for consideration of material considerations (para 2 of the National Planning Policy Framework (NPPF)), including material considerations not consistent with the Local Plan, such flexibility is necessary. As such it is poorly justified and does not wholly capture the statutory position. -Context and national policy will change during the proposed Plan period. A Whole Estate Plan that reflects such change might well not be consistent with the objectives and policies of the Local Plan, and as such would not be eligible to be endorsed by the Council. -It unnecessarily ties the Council's hands in making future decisions on Whole Estate Plans and renders the policy ineffective. -Is contrary to para 11a of the NPPF regarding positively seeking opportunities to meet development needs and be sufficiently flexible to adapt to rapid change." Overview document for a Sansaw Whole Estate Plan provided as an appendix to the representation. <u>Example of a policy cross-referencing Whole Estate Plans from the recently adopted South Downs Local Plan provided within the representation.</u>
A0355	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive (CLV012 and CLV018)	Not Specified	No	Not Specified	Consider proposed allocations CLV012 and CLV018 fail the 'justified' and 'effective' tests of soundness, as they are further from the railway station and village shop than CLV010 (previously preferred allocation) and cannot make the contributions to village infrastructure associated with CLV010. The justification for CLV012 and CLV018 rather than CLV010 within the site assessment relate to traffic through the village to access the A49 and access to services and facilities due to gradients. However, construction traffic through the village could be managed through condition requiring access of the A528 to the west and the gradient is very slight and CLV010 would also create a pedestrian footway along this length of Station Road, benefitting new and existing dwellings. CLV010 would also create a new footpath link to the existing public right of way (PROW) to the south of the village (intervening land owned by site promoter), providing residents with a largely off-road route to the railway station, school and village facilities (plan provided in representation) and would also provide hard surfacing to the element of the PROW between the school and CLV010. Land and the derelict Hilltop Cottages adjoining the school would also be made available to the school (it is currently physically constrained) as a contribution to community infrastructure and the sustainability of Clive (this is supported by school governors). The promoter has an excellent reputation for delivering housing.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0355	B002	Remove para 1f of draft Policy SP8 entirely.	<p>Noted. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology.</p> <p>The purpose of the draft Shropshire Local Plan to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines for proposed Community Hubs have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations.</p> <p>Para 1f of Draft Policy SP8 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such where these residential development guidelines are to be exceeded it cross-references draft Policy SP7. Draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.</p>	No
A0355	B003	<p>Modify section 3a of draft Policy SP10 to remove reference to 'small-scale'.</p> <p>Modify section 4d of draft Policy SP10 to remove reference to alteration and extension, instead referencing only minimal rebuilding.</p>	<p>Noted. Draft Policy SP10 reflects the Draft Plan's urban development focus and strategy of focusing growth in strategically agreed locations (set out in Draft Policy SP2) whilst supporting rural communities by enabling some controlled development to maintain local sustainability. Other draft policies in the plan relating to economic strategy and growth ( SP12; SP13, SP14) reflect the expectation that a sustainable pattern of development will be delivered by directing employment development primarily to identified strategic sites or to Shrewsbury, Principal Centres and Key Centres as these locations will more readily provide an employment land offer supported by housing, services and accessibility. However part 3 of draft Policy SP10 is positively phrased and thus allows for the consideration of other development which is not listed on its sustainability merits. As such it is considered that the broadening of the criteria by removing reference to small-scale is unnecessary and would undermine the proposed strategic approach within the draft Shropshire Local Plan and the plan led approach to managing development in Shropshire.</p> <p>Part 4d of the Draft Policy reflects local and national policy aims in respect of heritage assets. It also seeks to more broadly safeguard the character of buildings and the countryside. The draft policy does not necessarily preclude sympathetic alterations and extensions but expects that individual proposals would be considered on their merits as clarified by the draft policy explanatory text.</p>	No
A0355	B004	Modify section 1a of draft Policy SP15 to remove reference to the objectives, policies and land use proposals of Whole Estate Plans being consistent with objectives and policies of the Local Plan.	<p>Noted. Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. However, Shropshire Council also considers that it is appropriate for Whole Estate Plans to be endorsed by the Council and used as a material consideration in decision making to have objectives, policies and land use proposals that complement and are consistent with the objectives and policies of the Local Plan.</p>	No
A0355	B005	Allocate site CLV010 instead of sites CLV012 and CLV018.	<p>Shropshire Council considers that the proposed development strategy for Clive and the proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The proposed allocations have been informed by a proportionate and robust site assessment process.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0355	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Hadnall (HDL012 and HDL014)	Not Specified	No	Not Specified	Strongly support designation of Hadnall as a Community Hub, this is vital to ensure the village's long-term future. However the proposed residential guideline fails the 'justified' and 'positively prepared' tests of soundness. -Hadnall has a strong relationship to Shrewsbury (recognised within para 5.248 of the draft Shropshire Local Plan) and as such has significant potential for rural growth socially and economically. It is also located on the A49 strategic corridor (the draft Shropshire Local Plan proposes to prioritise investment in strategic locations and growth zones along strategic corridors), but the proposed residential guideline fails to reflect this. -The proposed residential guideline, excluding the 73 commitments, equates to just 3 dwellings per annum which is unjustifiably low for a well located, sustainable village. Also, as the capacity of the proposed allocation is 40 dwellings, the windfall allowance is just 13 dwellings. -The overall housing requirement for Shropshire is too low (see A0355 B001), Hadnall is ideally located to help meet the County's housing needs. -Previous experience shows incremental growth/single allocations fail to deliver much housing or significant changes to sustainability. A longer term strategic approach is required for transformational change (long-term plan for Sansaw Estates thriving business park is an example). A long-term vision for Hadnall (set out in an Appendix to the representation) has been ignored by the draft Shropshire Local Plan. As such, the draft Shropshire Local Plan fails to deliver significant improvements village sustainability and is not 'positively prepared' or 'justified'. Sites HDL012 and HDL014 are centrally located and can contribute to the vision set out in the Appendix to the representation. Both scored 'good' within the Council's sustainability appraisal (HDL014 scored higher than proposed allocation HDL006). Whilst the site assessment that informs the draft Shropshire Local Plan shows HDL014 has no major problems and was only discounted due to a preference for HDL006; and there are no technical reason why HDL012 cannot be allocated (highway information with the assessment is now out-of-date, as the highway authority has since undertaken work to the A49 that resolves the drainage issue).
A0356	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	Support draft Policy SP2 which identifies an appropriate level of growth consistent with the standard methodology. Also support the defined role of Shrewsbury as a Strategic Centre. Shrewsbury should continue to be the focus of new housing development.
A0356	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1	Not Specified	Yes	Not Specified	Draft Policy S16.1 is supported as it recognises the strategic role of Shrewsbury in the County and directs a significant proportion of the County's housing and employment land growth during the proposed Plan period to it. Also support identification of land to the west of the town (SHR060, SHR158 & SHR161) as a focus for growth during the plan period. This land is unconstrained and lies in a highly sustainable location. The land will make a significant and unique contribution towards meeting the growth needs of both the Town and the County.
A0356	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1(i) (SHR060, SHR158 and SHR161)	Not Specified	Yes	Not Specified	Draft Policy S16.1(i), Policy Map Inset S16(b) and Mixed Use Allocation SHR060, SHR158 & SHR161 are supported. SHR060, SHR158 & SHR161 is a significant allocation and provides a unique opportunity to meet the social, environmental, and economic needs of Shrewsbury and Shropshire, during the proposed Plan period and beyond. Consider it is essential that flexibility on the precise amount and mix of uses is provided so it best meets development requirements of the town. The promoter of the majority of the proposed site allocation (SHR158) has extensive experience and a proven track record of delivery (including adjacent development at Bowbrook). They are collaborating with the two parties controlling the remainder of the proposed allocation and a draft Masterplan is being prepared (concept framework plan to inform this appended to representation). Fully committed to preparing this masterplan, submitting a planning application and bringing forward the site for development early in the proposed Plan period (early discussions with housebuilders have occurred). Also committed to working proactively and positively with the Council, all landowners, the local community and other stakeholders. There are no abnormal costs or technical constraints that would render the development of the site unviable or undeliverable. If necessary, a detailed site-specific viability assessment can be provided in support of the draft allocation, however continue to question and would welcome engagement on some of the broad-brush assumptions and conclusions in the Council's current evidence on viability. With regard to proposed site guidelines for SHR060, SHR158 & SHR161: -Support the overall quantum of housing development proposed. -Support the quantum of employment land proposed, however request this is expressed as 5ha rather than minimum of 5ha to provide certainty for masterplanning and subsequent development. -Principle of providing a centre including neighbourhood shopping facilities, leisure and community uses is supported. However precise size, composition and location should be considered through masterplanning/planning application process. It should also be described as a Neighbourhood Centre to reflect scale and function of the proposed allocation. -Support the principle of providing safeguarded land for new educational and health facilities. However, careful consideration required of precise quantum, configuration and location through masterplanning process. Any references to specific land areas need to be fully evidenced. -Recognise need for a masterplan and quality, design, mix and layout of the development will be informed by site constraints and opportunities. -Support general approach taken to vehicular access points, pedestrian, and cycle links within and through the site, which will be considered through the masterplanning process. Concerned about reference "all necessary improvements to the Local and Strategic Road Networks will be funded through the development" as it is imprecise and open ended. Request the Council consider alternative wording which ensures mitigation necessary to accommodate unacceptable impacts of development on the highway network are provided/funded by the developer. Note suggested provision of a Park and Ride facility on SHR161 and recognise desire to ensure integration/linkages from the Park and Ride to the wider development. -Support the approach taken to green and blue infrastructure. Sustainable drainage and green infrastructure strategies will be key components of masterplanning. -Concerned about the proposal that "a decision on a planning application will not be made until such time as a Masterplan for the site has been approved by Shropshire Council". Request alternative wording which provides greater clarity on the process by which the Council intends approve a masterplan to avoid undue delays.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0355	B006	Increase the proposed housing guideline for Hadnall to around 300 dwellings. Include sites HLD012 for 40 dwellings and HDL014 for 150 dwellings as proposed allocations (suggested guidelines provided in representation).	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed development strategy for Hadnall and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The proposed allocation have been informed by a proportionate and robust site assessment process.</p>	No
A0356	B001	N/A	Noted.	No
A0356	B002	N/A	Noted.	No
A0356	B003	<p>With regard to the proposed site guidelines for SHR060, SHR158 &amp; SHR161:</p> <ul style="list-style-type: none"> <li>-Express the proposed employment land provision as 5ha rather than a minimum of 5ha.</li> <li>-The local centre should be described as a Neighbourhood Centre. Its precise size, composition and location of the should be considered through masterplanning/planning application process.</li> <li>-Provide alternative wording which ensures mitigation necessary to accommodate unacceptable impacts of development on the highway network are provided/funded by the developer rather than the current open ended "all necessary improvements to the Local and Strategic Road Networks will be funded through the development".</li> <li>-Provide greater clarity on the process by which the Council intends approve a masterplan to avoid undue delays to development.</li> </ul>	<p>General support for this proposed allocation is welcomed. In supporting an appropriate mixed development, it continues to be considered appropriate to express the employment land guideline as a minimum. This will ensure the greatest opportunity to deliver an appropriate range of high quality and flexible employment uses, potentially as part of an enhancement to the town's Park and ride offer to the north of the site. It is considered the current proposed policy wording with regards to the Council agreement of the masterplan is sufficient. A minor modification is proposed to ensure greater clarity with regards to level of developer contribution to highway infrastructure.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0357	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	No	No	<p>The proposed housing requirement (around 1,400 dwellings per annum) does not meet the Duty to Co-operate and fails the 'positively prepared' and 'consistent with national policy' tests of soundness as:</p> <ul style="list-style-type: none"> <li>-It represents a reduction of the 1,530 dwellings planned for within the adopted Core Strategy from 2021, failing to support Government's objective of 'boosting the supply' identified within para 59 of the National Planning Policy Framework (NPPF).</li> <li>-It is significantly lower than the 2018-based household projections which forecast an average growth of 1,656 households per annum (2016-2038), constraining growth rather than meeting need.</li> </ul> <p>Recognise it exceeds Local Housing Need (LHN) calculated using Government's standard methodology, but consider exceptional circumstances exist to justify an alternative approach which reflects current and future demographic trends and market signals (as per para 60 of the NPPF). Specifically the large difference between the 2014-based (which inform the standard method) and 2018-based household projections (24,241 households above the standard method estimate of 23,749 households) over the proposed Local Plan period (graph/table provided within representation). Covid-19 has increased growth/demand in Shropshire in 2020 and resultant shifts towards more internet-based working from home will continue this, as commuting considerations are replaced by quality of life.</p> <p>The level of under-provision will result in rising house prices as demand outstrips supply, worsening affordability (Shropshire already has an affordability ratio of higher than the average for the West Midlands and England (figure provided in representation) and expect this to increase given recent rapid house price rises), and failure to meet the 'positively prepared' test.</p> <p>The Association of Black Country Authorities (ABCA) have requested assistance in meeting unmet housing need (26,000 dwellings to 2038, which is only likely to increase further given Government's new standard methodology which uplifts housing need in Birmingham and Wolverhampton by 35%). Despite limited constraints/Green Belt, Shropshire have proposed only a 1,500 dwelling contribution. Consider this fails the duty to cooperate and para 60 of the NPPF, which requires unmet needs within neighbouring areas to be taken into account. No statement of common ground has been published with ABCA, contrary to para's 24-27 of the NPPF which requires their preparation and availability.</p>
A0357	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Yes	Yes	Not Specified	<p>Support draft Policy SP3 and particularly welcome sections 1a and 1e which seek to reduce carbon emissions by encouraging new development to link to and where possible integrate public transport. Proposed allocation ALB017 helps support this by providing residential development within easy walking distance of a good railway service on the Shrewsbury-Wolverhampton line.</p> <p>Concerned about how section 2a of draft Policy SP3 is applied through draft Policy DP11. Support renewable and low carbon energy systems, but technologies required should be appropriate to Shropshire. Policy DP11(d) seeks to maximise use of district heating and cooling systems on relatively modest sites, which is impracticable, unjustified and unviable.</p>
A0357	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Yes	No	Not Specified	<p>Consider draft Policy SP7 fails the 'justified', 'effective' and 'consistent with national policy' tests of soundness.</p> <p>It is 'not justified' as para 3 of draft Policy SP7 proposes that settlement guidelines are 'significant policy considerations'. Whilst the proposed supporting text to draft Policy SP7 notes these guidelines are not a ceiling to development, in practice operation of para 3 of draft Policy SP7 restricts the amount of development in identified sustainable settlements. No evidence is presented that these guidelines represent appropriate strategies, taking into account reasonable alternatives or that they represent a sustainable level of development (or that more would be unsustainable).</p> <p>It is 'not consistent with national policy' as applying settlement guidelines to restrict development is contrary to para 59 of the National Planning Policy Framework (NPPF) which seeks to boost the supply of housing and para's 60 and 73 of the NPPF regarding treating housing requirements as minimums.</p> <p>It is 'not effective' as in combination with draft Policy DP1 it will adversely impact on housing delivery by making proposed allocations undeliverable. This is because draft Policy SP7 limits housing numbers in a settlement and draft Policy DP1 seeks a higher proportion of smaller houses, effectively requiring more units on a site to achieve the same saleable floorspace/benchmark land value expected by landowners (the Viability Study undertaken to inform the draft Shropshire Local Plan demonstrates that viability is finely balanced in many parts of the County (extract provided within representation), so saleable floorspace must be maximised), which will be difficult to achieve if doing so exceeds a settlement guideline. This also suggests Planning Permissions will be required for 200% of the residential guideline figure to achieve 100% of the guidelines, yet draft Policy SP7 does not make sufficient allowance for a high proportion of sites being unviable.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0357	B001	Increase the annual housing requirement to 2,300 dwellings (50,600 dwellings between 2016 and 2038). Starting point for this is the 2018-household projection average annual growth of 1,656 dwellings per annum, adds in the standard method's adjustment for the 2019 affordability ratio and adds 5,000 dwelling contribution to unmet cross-boundary need.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Government has recently consulted upon potential changes to the methodology for calculating LHN, including the potential use of the 2018-based sub-national household projections (SNHP). As a result of this consultation Government determined that it was most appropriate to retain the use of the 2014-based SNHP for this calculation. Furthermore, in responding to this Consultation, Shropshire Council indicated its significant concerns regarding the 2018-based SNHP, particularly with regard to their reliance on the 2018-based sub-national population projections (SNPP) which utilised only 2-years of internal migration data in their formulation.</p> <p>With regard to the adopted Local Plan housing requirement, it is important to note that this is an aspirational but achievable housing requirement, which exceeded past housing need calculations and continues to exceed calculations of LHN using Government's standard methodology. Furthermore, the housing requirement was phased into 5-year time periods (the average housing requirement over the total period covered by the adopted Local Plan is some 1,375 dwellings per annum). The draft Shropshire Local Plan also proposes an aspirational, but achievable housing requirement, which averages some 1,400 dwellings per annum, which meets identified LHN and provides an opportunity to respond/support other objectives as referenced above.</p> <p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. It is considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No
A0357	B002	N/A	Comments in respect of Policy SP3 are noted	No
A0357	B003	Draft Policy SP7 should be modified to: -Under point 3, remove reference to 'significant' in relation to residential development guidelines. -Under point 3b, recognise the need to include a 25% non-delivery allowance in relation to outstanding commitments. -Under point 3, expand the list of considerations, in situations where a residential guideline would be exceeded, to include two new considerations, specifically the delivery of the housing mix sought in draft Policy DP1 and the viability and delivery of the plans allocated sites.	<p>Noted. The purpose of the draft Shropshire Local Plan is to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations.</p> <p>However, draft Policy SP7 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such, draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.</p> <p>As such, Shropshire Council considers that draft Policy SP7 is justified, effective and consistent with national policy. It is also considered that draft Policy DP1 is complementary in that it ensures the effective use of land and that the forms of housing delivered are responsive to the needs of local communities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0357	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Yes	No	Not Specified	<p>Have very serious concerns about impact of Policy DP1 on deliverability of the Plan, when combined with draft Policies SP7, SP8 and SP9. These policies together limit the size and number of houses, undermining the viability of many developments. As such, consider draft Policy DP1 in combination with other proposed policies prevents the draft Shropshire Local Plan from meeting the 'effective' test of soundness.</p> <p>-Section 2b of draft Policy DP1 provides a default housing mix, however it is not clear why it does not estimate the percentage of 4-bed plus housing, which is the most popular (a trend that is likely to be accentuated to accommodate working from home following the Covid pandemic). This mix is reflected in the Viability Study for the draft Shropshire Local Plan, which finds a high proportion of typologies unviable. The natural solution is to increase saleable floorspace to make development more viable, however draft Policies SP7, SP8 and SP9 seek to avoid exceeding residential guidelines, limiting numbers and making a high proportion of development unviable and undeliverable.</p> <p>The proposed housing mix in section 2b of draft Policy DP1 is also not 'justified' or 'effective', as Para 4.5 of the proposed explanation to draft Policy DP1 refers to the Strategic Housing Market Assessment (SHMA) which translates household projections into housing need, however this confuses/over-simplifies 'need' and 'demand', as the majority want larger dwellings than need dictates and does not consider 'need' for home offices/guest room(s). 3-bed dwellings are the most popular size, therefore a 25% requirement for 2-bed or less dwellings does not match demand, which is for larger dwellings.</p> <p>-Section 5 of draft Policy DP1 requires set percentages of M4(3) wheelchair user dwellings (5%) and M4(2) accessible and adaptable dwellings (further 70%). Para 4.26 of the explanation to draft Policy DP1 seeks to justify this through references to the Strategic Housing Market Assessment (SHMA), however the figures identified (13% M4(3) and 33% M4(2)) are completely different to the proposed requirements. The explanation seeks to justify this by referencing the ageing nature of Shropshire's existing population, however this population already occupies existing dwellings, the bulk of which can be adapted (the SHMA estimates 53%), reducing need for new build stock to meet higher standards. Also, even if older households increase, this does not mean they will occupy new housing. As such the requirement for M4(2) housing fails the justified test of soundness.</p> <p>The requirements of section 2b and 5 of draft Policy DP1 also potentially conflict (requirement for small 2 bedroom houses) and raise issues of viability (based on figures in the Viability Study undertaken to inform the draft Shropshire Local Plan, it is considered that the requirements of section 5 would cost £48,150/ha), flexibility about housing types is required to reflect these costs, meaning a relaxation of section 2 is required.</p> <p>-Seriously concerned that section 6 of draft Policy DP1 has too low a threshold and will render many sites undeliverable. Specialist housing normally consists of blocks of at least 50 units to allow delivery of specialist services, representing the entirety of 50 dwelling schemes and half of 100 dwelling schemes. Many allocated sites for 50 or more dwellings are on edges of settlements, not ideal for specialist housing and it is questionable whether providers would be interested in such locations. Also, specialist housing is outside the business model for many developers and they would therefore be delivered by a different provider, reducing general housebuilder interest in medium sized sites, so the policy fails the effective test of soundness. There may be a role for specialist housing on larger urban extensions but not medium sized sites.</p>
A0357	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Yes	No	Not Specified	<p>Consider section 2 of draft Policy DP2 fails the 'justified' and 'effective' tests of soundness, as:</p> <p>-It is unclear whether failure to provide the encouraged 10% self-build/custom-build housing would constitute a reason for refusal of a Planning Application.</p> <p>-The 10% requirement does not match evidence. The Strategic Housing Market Assessment (SHMA) identifies that total forecast supply is likely to meet total forecast demand without any existing self-build policies.</p> <p>-The Self-Build Register covers all of Shropshire, which is very large. Provision in one part will not meet identified need arising in another, so this is not an appropriate strategy.</p> <p>-Section 2b relating to providing access to self-build plots is very problematic as access to self-build plots via adopted/adoptable roads mean they need to be central to a site rather than discrete from housebuilder activities and simultaneous construction (housebuilder and self-builder) is impractical as management of the construction site becomes complicated. No evidence/justification is provided.</p> <p>-Section 2d relating to marketing of plots for 24 months means occupants of the wider site may be living next to a marketed plot/self-build developed plot for some time. Purchasers of new build homes want certainty about build timescales/design around them, this lack of certainty will significantly reduce sales values and undermine viability.</p> <p>-Impact of self-build plots is not considered within the Viability Assessment undertaken to inform the draft Shropshire Local Plan.</p> <p>-There is no evidence self-builders want to live on large estates, but anecdotally preference is individual plots.</p> <p>The policy would be better framed to take a positive approach towards small scale self-build plots across the County.</p>
A0357	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Yes	No	Not Specified	<p>Policy DP3 is not considered deliverable and fails the 'justified' and 'effective' tests of soundness, as:</p> <p>-The Viability Study for the draft Shropshire Local Plan concludes that (even with the very low benchmark land value applied, consider landowners expectations are at least £1m/Ha) the proposed policy requirements set by draft Policies DP1, DP2, DP3 and DP11 make viability very challenging for all sites over 60 dwellings in the south of the county (76% of planned development in the south) and unviable for affordable housing contributions of more than 10%. As such the proposed affordable housing contribution from sites in the south is too high.</p> <p>-Para 1d requires a split in affordable housing tenures of 70% affordable or social rent and 30% intermediate housing. This is inflexible and likely to be problematic over the lifespan of the Plan. Government has recently published a consultation proposing 25% of affordable units must be First Homes. If this change is introduced, the tenure split will need to reflect Government policy. The most effective response is to ensure the policy is flexibly worded to enable change over the lifespan of the Local Plan.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0357	B004	<p>Para 2a and b of draft Policy DP1 should be replaced with the following: "2. On sites of 5 or more dwellings residential development will be expected to provide a mix of dwelling sizes, types and tenures in order to meet the identified needs of local communities, having regard to surveys undertaken in the last 5 years through the 'Right Home Right Place' initiative, evidence from the SHMA, market demand and any other local evidence".</p> <p>Para 5 of draft Policy DP1 should be modified to require 33% M4(2) housing on sites of 5 or more dwellings.</p> <p>Para 6 of draft Policy DP1 should be modified to increase the threshold to 500 dwellings.</p>	<p>Noted. Shropshire Council considers that draft Policy DP1 is justified, effective and consistent with national policy. It is also considered that other relevant draft policies are complementary.</p> <p>With regard to para 2 (including 2b) of draft Policy DP1, it is considered that this provides an appropriate balance between ensuring that new development will include an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry), and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand. Given this approach, it is not considered necessary to prescribe a set amount of 4 bedroom plus properties, as these will form part of the suitable mix achieved on the remaining 50% of the site.</p> <p>The mix proposed within para 2b is informed by the Strategic Housing Market Assessment (SHMA) of the draft Shropshire Local Plan, which is considered a robust and proportionate assessment.</p> <p>With regard to para 5 of draft Policy DP1, the SHMA identifies that growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the Local Plan period from 2016 to 2038. It then (as explained in para 4.26 and 4.27 of the draft Shropshire Local Plan) calculates a total need for M4(2) and M4(3) housing, which when account is taken of the significant growth in households with a Household Reference Person aged 65 years and over, equates to 77% of total household growth (of which M4(3) constitutes around 13%). These figures have been informed by consideration of the ability of existing properties to be reasonably adapted. As such Shropshire Council considers that the SHMA justifies the proposed thresholds for M4(2) and M4(3) standard dwellings. It is acknowledged that building properties to M4(2) standard will not mean they are necessarily occupied by those in need, but it is important to ensure that the opportunity exists for households in need to access appropriate properties.</p> <p>With regard to para 6 of draft Policy DP1, the Strategic Housing Market Assessment (SHMA) indicates that growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the proposed Local Plan period from 2016 to 2038 and also identifies a specific need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision. With regard to specialist designed housing for older people, the National Planning Practice Guidance (NPPG) on Housing for Older People recognises that there is a significant amount of variability in the types of specialist accommodation for older people, identifying four main categories which can be summarised as: a. "Age-restricted general market housing; b. Retirement living or sheltered housing; c. Extra care housing or housing-with-care; and d. Residential care homes and nursing homes". Reflecting the need for and variety of types of specialist accommodation, it is considered that the threshold of 50 or more dwellings proposed within para 6 of draft Policy DP1. However, it is recognised that sites of 50 or more dwellings will be diverse in nature, as such a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors.</p>	No
A0357	B005	<p>Modify draft Policy DP2 to:</p> <ul style="list-style-type: none"> <li>-In para 2, remove the encouragement to make 10% of dwellings available as serviced plots for self-build / custom-build development to considering making some provision.</li> <li>-In para 2, clarify that this is particularly encouraged where there is an identified need on the Self-Build Register 'for plots in the settlement' rather than just where there is an identified need on the Self-Build Register.</li> <li>-In para 2a, clarify that the range of plot sizes respond to the needs identified on the Self-Build Register 'for plots in the settlement' rather than just the need identified on the Self-Build Register.</li> <li>-In para 2b, delete the text relating to: prior to 25% occupation of the relevant phase in which the serviced plots are located as agreed at planning application stage.</li> <li>-In para 2d, reduce the marketing period for self-build/custom-build plots from at least 24 months to at least 6 months.</li> </ul>	<p>Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position. It is also considered that this draft Policy provides appropriate flexibility to respond to the differing circumstances of specific sites and communities and as such will not impact on development viability. The 24 month marketing timescales proposed within the draft Policy and point at which the plots become accessible are considered appropriate and balance the need to provide an appropriate opportunity for potential self-builders/custom-builders to secure the plot, whilst also recognising the relationship to the wider development of the site and its future occupiers.</p>	No
A0357	B006	<p>Modify draft Policy DP3 to:</p> <ul style="list-style-type: none"> <li>-In para 1aii. Reduce the proposed affordable housing contribution in the south of Shropshire to 10%.</li> <li>-in para 1d. Expand the text regarding the tenure split of affordable housing to specify 'or unless an alternative mix is considered appropriate and agreed with the developer'.</li> </ul>	<p>Noted. Shropshire Council considers that the proposed affordable housing contributions are appropriate. They respond to the significant affordable housing need identified in Shropshire and best available information on development viability, from within the Shropshire Viability Study. Shropshire Council also considers that the proposed tenure split effectively responds to evidence on affordable housing needs, as summarised within para 4.52 of the explanation to draft Policy DP3 of the draft Shropshire Local Plan. It also provides flexibility for alternative tenure splits where local need would support this.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0357	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Yes	No	Not Specified	Generally support proposed measures to minimise carbon emissions in draft Policy DP11, but note its explanation makes little reference to its impact on viability and deliverability. To pass the 'effective' test, impact on viability should be explicitly acknowledged in the explanation, as should the significant ask placed on developers and the fact that some development may become difficult to deliver without reductions to other obligations such as affordable housing. Consider that draft Policy DP11 fails the 'justified' and 'effective' tests of soundness as the Viability Study undertaken to inform the draft Shropshire Local Plan identifies that draft Policy DP11 will increase development costs significantly and acknowledges a challenging viability context with many scales of development in different parts of Shropshire unviable (even with the very low benchmark land value applied, consider landowners expectations are at least £1m/Ha). Section 4 of draft Policy DP11 acknowledges that there may be viability problems for some sites. It may be necessary to identify 125% of the land needed in order to deliver 100% of the housing required, given the high percentages of sites that the Viability Study concludes are unviable, but this is not done. Section 1d of draft Policy DP11 seeks district heating systems and zero net-carbon on sites of 50 or more dwellings. Consider district heating systems are not deliverable or feasible at the threshold specified (district heating systems are commonly for much larger scale development) and no evidence is provided to justify it. Connection costs are also higher for lower density housing. Therefore this is not justified or effective.
A0357	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S1.1 (ALB017)	Yes	No	Not Specified	The strategic approach in draft Policy SP2 responds to the Shropshire Economic Growth Strategy by prioritising growth zones, including the M54 corridor upon which Albrighton (and the proposed strategic site at nearby RAF Cosford) is located. The potential of the M54 corridor is confirmed in the M54 Growth Corridor Strategic Option Study undertaken to inform the draft Shropshire Local Plan. Furthermore, the Association of Black Country Authorities (ABCA) note the close relationship and railway links (stops at Albrighton and RAF Cosford) between east Shropshire and the Black Country. However, despite this draft Policy S1,1 seeks to deliver only 500 dwellings in Albrighton over the proposed Plan period. This is unchanged from earlier drafts of the document which had a 20 year rather than 22 years proposed Plan period, therefore at the very least a proportionate increase (50 dwellings) should be made. However given the strategic location, range of services, rail links, range of employment opportunities and strong market demand, consider a higher guideline of some 700 dwellings would be deliverable, reflect evidence and be an appropriate strategy. As such, do not considered the proposed housing guideline for Albrighton represents an appropriate strategy and it is not justified.
A0357	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	ALB017	Yes	No	Not Specified	Can confirm that the site is viable and deliverable, having regard to the policy requirements in the draft Plan. Can also confirm the delivery timescales for this site shown in Appendix 7 of the draft Shropshire Local Plan are appropriate. The site is able to deliver in the early years of the plan period, a Pre-Application enquiry has already been undertaken (no objections from highways, affordable housing, drainage, conservation, archaeology, ecology, trees, contaminated land and public rights of way were received) and an Outline Planning Application will be submitted at the earliest opportunity once the draft Shropshire Local Plan has reached an advanced stage. A suite of technical documents, including a draft Masterplan, prepared in support of development proposals for ALB017 form appendices to the representation. Draft guidelines for proposed allocation ALB017 do not reflect evidence and therefore do not meet the 'justified' or 'effective' tests of soundness. Specifically: -Proposed guidelines include a roundabout access. However advice from the highways team on a Pre-Application Enquiry (PREAPP/20/00169) for the site expressed no concerns about a T-Junction access (see appendices to representation). A roundabout would result in loss of significantly more mature trees on Kingswood Road (see appendix to representation) which are a natural gateway feature and important to the character of the area. -Requirements for vehicular, cyclist and pedestrian links into the adjacent site saved SAMDev Plan Allocation ALB002 unreasonable. Such a link can be provided into the northern part of ALB002, but a vehicular connection to the site boundary for the southern part of ALB002 was not required within its Planning Application (despite representations which form an appendix to the representation). Consider the northern link, which will link Kingswood Road to Shaw Lane is sufficient (see appendix to representation). -Seeking on-site public car parking facilities to alleviate pressure on existing facilities is not justified or effective as few would choose to park 500m from the doctors or railway station. -Green Infrastructure providing public open space that links to the wider area and an ecological corridor along the railway line are very different and combining the two will result in difficult to effectively deliver either. The requirement to retain trees and hedges is sufficient to ensure that the railway corridor remains undisturbed. The guideline requiring an 'associated green infrastructure corridor' along the railway line conflicts with 'secured by design' guidelines and will result in public open space being located in sub-optimal locations. The guidelines' treatment of the railway line will make it difficult for development to achieve a satisfactory layout and fails the 'effective' test of soundness.
A0357	B010	Sustainability Appraisal	Sustainability Appraisal	Yes	No	Not Specified	As previously documented, the Sustainability Appraisal (SA) is incorrect for site ALB017 as it does not recognise proximity of a children's play area and amenity open space. These are being constructed on a site within 100 metres of ALB017. This converts two negative scores (-2) into two positive scores (+2) and thereby changes the SA scores for site ALB017 from -6 to -2, changing its rating from 'Fair' to 'Good'.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0357	B007	Delete para 1d of draft Policy DP11. Include an additional paragraph in the explanation to draft Policy DP11 stating "Minimising carbon emissions will add significantly to the cost of construction and on some sites this may require a reduction in affordable housing and/or other contributions".	A Whole Plan Viability Assessment has been undertaken to inform policy requirements with the intention of ensuring the viability and deliverability of the draft Shropshire Local Plan. Draft Policy DP11 has been subject to due consideration within this assessment. It is considered appropriate to encourage development of 50 or more dwellings to maximise the use of on-site district heating and cooling, although it is recognised that this may not always be feasible. No change proposed	No
A0357	B008	Increase the proposed housing guideline for Albrighton from 500 dwellings to 700 dwellings over the proposed Plan period.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council considers that the proposed development strategy for Albrighton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Furthermore, proposed allocations and proposed safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, informed by a proportionate and robust Green Belt Review. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No
A0357	B009	Amend the draft site guidelines for proposed allocation ALB017 as follows: -Require an appropriate access rather than roundabout at the point of access into the site. -Replace the requirement for a northern and southern vehicular, cyclist and pedestrian connection into the saved SAMDev Allocation ALB002, with seek to provide a connection into the saved SAMDev Allocation ALB002. -Delete the guideline relating to considering opportunities to provide on-site public car parking facilities. -Delete the requirement for green infrastructure to include an appropriate green buffer of the railway line and the associated green infrastructure corridor.	Noted. Shropshire Council considers that the proposed site guidelines for ALB017 are appropriate and sound. With regard to vehicular, cyclist and pedestrian connections into the adjoining SAMDev Plan allocation ALB002, the concerns raised are noted, but in order to ensure that access to services and facilities in the town and integrated communities are achieved, links between the two sites are considered essential. However, it is considered appropriate to propose a minor modification to proposed site guidelines to recognise the design and layout approved on the southern element of SAMDev Plan allocation ALB002. With regard to the proposed guideline for an appropriately designed roundabout at the point of access into the site, Shropshire Council continues to believe a roundabout remains the most appropriate means of access to the site and initial highway comments on the pre-application referenced in this representation are not considered to contradict this position. Indeed they note that "any future planning application should provide any and all details necessary to assist with the appropriate determination from a Highways and Transport perspective. This should include vehicular and pedestrian/cycle access and junction details with associated visibility splays, sustainable travel facilities, Transport Assessment and Travel Plans." It is also noted that this access point will also serve the ALB021 element of the proposed allocation and will connect to essential linkages through to the adjoining saved allocation ALB002. It is considered appropriate to include a guideline regarding consideration of the potential to provide on-site public car-parking, as it is noted that this is a matter of significant local interest. It is considered appropriate to require a green infrastructure buffer along the railway line/green infrastructure corridor, as such provision responds to ecology comments that this corridor forms an environmental network and as such should be buffered. It is also considered that such provision, alongside the wider design and layout of the development, will effectively respond to any issues of noise associated with the railway line, an issue raised within the public protection assessment of the site.	Yes
A0357	B010	Correct Sustainability Appraisal (SA) scores for site ALB017 in relation to proximity to a children's play area and amenity open space. Undertake associated corrections to the SA results.	The Sustainability Appraisal (SA) does not consider future open space provision to be made through development - this is considered at the planning application stage when the details of a proposal are known. Such issues cannot be taken into account at the Plan making stage and thus cannot form part of any SA. No change proposed.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0358	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S5.1 CST019VAR	Not Specified	No	Not Specified	<p>The proposed housing guideline for Church Stretton fails the 'positively prepared' and 'justified' tests of soundness as:</p> <ul style="list-style-type: none"> <li>-It is a sizeable settlement (4,000 residents) and has a very good range of services and facilities (3rd highest ranking Key Centre within the Hierarchy of Settlement Assessment (HoS) undertaken to inform the draft Shropshire Local Plan), but despite this a low level of growth is proposed for the town (0.46 per annum), despite high demand and significant affordability issues. Whilst the location of the town in the Shropshire Hills AONB is a valid consideration, the Council previously consulted on a higher rate of growth (0.63% per annum), consider this rate is more justified than that now proposed.</li> <li>-Identifying an appropriate level of growth for Church Stretton must consider latest (2018-based) household projections for Shropshire which forecasted 26.9% growth. Reflecting this in Church Stretton would result in demand for 534 more dwellings. In practice, Church Stretton is subject to greater demand than the Shropshire average (evidenced by house prices) so will likely outstrip this. Low levels of development will result in pressure on house prices and reduce affordability, undermining social and economic sustainability.</li> <li>-Church Stretton is in the highest viability area (1 of only 3 settlements) identified within the Viability Study undertaken to inform the draft Shropshire Local Plan. Given the viability issues identified across Shropshire in this study, levels of development in Church Stretton cannot afford to be minimised.</li> </ul> <p>Furthermore, the draft Shropshire Local Plan does not identify where future housing development will be situated to achieve the proposed guideline, relying on windfall and the remaining so far undelivered saved SAMDev allocation CST019. No new allocations are proposed (despite two potential sites being identified during earlier stages of consultation, dropped due to public objection) and one existing SAMDev residential allocation is proposed to not be saved. Past high demand means most windfall sites have long since been developed and the remainder will struggle to comply with proposed environmental policies. As such, consider the town's housing requirements fails the 'positively prepared', 'justified' and 'effective' tests of soundness.</p> <p>Also consider the existing employment allocation proposed to be saved, is subject to access issues and without changes is undeliverable, failing the 'effective' test of soundness. The draft Shropshire Local Plan has an opportunity to address this.</p> <p>Draft Policy S5.1 requires development proposal to recognise the importance of conserving and where possible enhancing the special qualities of the Shropshire Hills AONB... with "the highest and most sensitive design standards". Concur that well designed development on appropriate sites can provide the necessary balance, providing for the town's undisputed development needs whilst protecting and enhancing the AONB. However, this is best achieved by allocating a site large enough to deliver landscape enhancements for the town.</p> <p>Site CST019VAR would provide a suitable site to help meet housing needs. It has development on three sides and the railway line on its fourth (with mature tree boundaries on three sides); access can be established off Lawley Close (landowner has confirmed willingness to include their roadway to provide access from the south via Lawley Close), unlike as previously assessed via Shrewsbury Road; would fit within existing landscaping (the landscape and visual sensitivity assessment undertaken to inform the draft Shropshire Local Plan identifies the parcel north of the railway line (containing CST019VAR) as having the lowest sensitivity, with no designated features or key views); provide enhanced planting to screen the town; protect and enhance biodiversity; flood risk can be accommodated (illustrative layout plans appended to representation); and adjoins and could provide access to employment allocation ELR078. CST019VAR achieves a 'Good' rating within the Sustainability Appraisal assessment. Further details including aerials on CST019VAR provided within the representation and its appendices. The site is considered viable and deliverable.</p> <p>The Policies Map for Church Stretton does not include recent developments within it, including dwellings north (on planning consent 18/01258/OUT) and south (at Lawley Close) of CST019VAR. Nor does it include the existing employment allocation. These are serious omissions and should be corrected.</p>
A0359	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	<p>Support aspiration to accommodate investment and new development that contributes to meeting needs and making its settlements more sustainable.</p> <p>Support identification of Ludlow as a Principal Centre. This accords with the Local Plan vision, given Ludlow's strategic location on the A49 corridor.</p>
A0359	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	Not Specified	No	Not Specified	<p>Support aim of draft Policy SP13 to support the delivery of the Economic Growth Strategy and support a step change in economic productivity. However, whilst para 3.123 of the explanation to the policy recognises the need for flexibility in the development of employment land to meet need, proposed criterion 7 of draft Policy SP13 seeks to protect allocated employment land/established employment areas to primarily Class B employment uses. It is considered greater flexibility is required regarding employment uses permissible on proposed allocations given uncertainty post Covid-19. As this draft Policy will constrain growth rather than meeting need and is therefore not 'positively prepared'.</p>
A0359	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Not Specified	Yes	Not Specified	<p>Draft Policy SP14 states that the Economic Growth Strategy seeks to deliver a step change in capacity and productivity of the local economy and to contribute to this strategic corridors will be the primary focus for major development. Supporting text to draft Policy SP14 identifies Ludlow as a Principal Centre on a Strategic Corridor. As such support draft Policy SP14 as it recognises the importance of Ludlow socially and economically.</p>
A0359	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S10.1	Not Specified	Yes	Not Specified	<p>Support Draft Policy S10.1 and its supporting text as they recognise the strategic role of Ludlow (largest market town in south Shropshire and principal focus for investment and development).</p> <p>Identification of 11ha employment land to meet the needs of the town and its hinterland (including employment land allocation LUD052 and saved employment land allocation ELR058) is supported. This will make a significant and unique contribution to meeting employment growth needs of the town, this area of the County and realising the objectives of the Economic Growth Strategy/draft Ludlow Local Economic Growth Strategy.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0358	B001	<p>Increase the proposed housing guideline for Church Stretton to 275 dwellings. Identify site CST019VAR as a proposed allocation for 65 dwellings (example site guidelines in representation). Make associated updates to the draft Shropshire Local Plan and Policies Map.</p> <p>Amend the development boundary for Church Stretton to include the existing development at Lawley Close, the planning consent 18/01258/OUT and existing employment allocation ELR078.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Church Stretton and the existing commitments (including the existing allocations) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities, including its location within the Shropshire Hills AONB.</p> <p>We would note that the proposed increase to the housing requirement is greater than the capacity of the proposed allocation.</p>	No
A0359	B001	N/A	Noted.	No
A0359	B002	Criterion 7 of draft Policy SP13 should be amended specified allocated employment land is protected for all the employment use classes identified in the draft Policy.	The protection provided in Policy SP13 criterion 7 does relate to allocated employment land and as well as to the protection of existing premises for Class B uses on established employment areas. The provisions in criterion 7 in relation to allocated employment sites will be implemented with a greater degree of flexibility since the allocated sites remain subject to the general provision of Policy SP13 and particularly criteria 2, 3 and 5.	No
A0359	B003	N/A	Shropshire Council welcomes the support for Policy SP14 as part of the employment development strategy for Shropshire which is considered to be appropriate, effective, sustainable and deliverable.	No
A0359	B004	N/A	Shropshire Council welcomes the support for Policy S10.1 recognising that the strategy for the Market Town of Ludlow will provide an opportunity to deliver new housing and employment development to strengthen the role and function of this Market Town and to support the rural settlements and communities in the Ludlow Place Plan area.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0359	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S10.1(ii) LUD052	Not Specified	Yes	Not Specified	Support draft Policy S10.1(ii), the Ludlow Policy Map Inset and proposed employment allocation LUD052 (it will make a significant and unique contribution to meeting employment growth needs of the town and realising the objectives of the Economic Growth Strategy/draft Ludlow Local Economic Growth Strategy). Note LUD052, together with saved employment allocation ELR058, have been assessed by the Council as being unconstrained, viable and deliverable/developable. Combined these sites are large (8ha), will significantly improve the employment land offer in Ludlow, broaden the range of commercial premises/businesses, and meet employment needs of Ludlow. Support para 5.136 of the explanation to draft Policy S10.1 regarding flexibility for employment uses delivered on proposed allocations, but such flexibility must respect significance and setting... However, as per representation on draft Policy SP13, request maximum flexibility regarding employment generating uses is provided, given uncertainty of the post-Covid marketplace. Aware of Historic England concerns over proposed employment allocation LUD052, as such an initial Heritage Assessment is submitted as an appendix to this representation. This clearly identifies harm to the historic environment resulting from development would be less than substantial and can be mitigated at the detailed design/Planning Application stage through sensitive design and conditions. As such, there are no heritage reasons why the site should not be allocated.
A0360	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	Support aspiration to accommodate investment and new development that contributes to meeting needs and making its settlements more sustainable. Identification of Wem as a Key Centre accords with the Local Plan vision, given Wem's strategic location on the A49 corridor with excellent connections to Shrewsbury and other regions to the north.
A0360	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.1	Not Specified	No	Not Specified	Strongly support identification of Wem as a Key Centre as it is a sizeable settlement, has a good range of services and facilities (highest scoring Key Centre within the Hierarchy of Settlements Assessment undertaken to inform the draft Shropshire Local Plan Review), is identified as a strategic focus for growth in north-east Shropshire (proposed explanation to draft Policy S17.1) and is located on a Strategic Corridor (as recognised within the draft Shropshire Local Plan) and draft Policy SP14 seeks to focus major development into such corridors. This status is vital to its long-term future. Despite this and high demand for housing/affordability issues in the town (documented within the Strategic Housing Market Assessment (SHMA) undertaken to inform the draft Shropshire Local Plan), a low level of growth is proposed and a significant reliance placed on windfall development (89 dwellings) to meet need over the proposed Plan period. The level of growth proposed is also less than that experienced during the current Plan period (27.2 and 32.8 per annum respectively), less than the Shropshire average (20.8% and 21.9% respectively), and less than the average percentage growth forecast for Shropshire in latest 2018-based household projections (20.8% and 26.9% respectively) which would indicate demand for 774 dwellings, although in practice Wem's popularity is likely to attract higher demand than the County average - low levels of development will result in pressure on house prices and reduce affordability, undermining social and economic sustainability. Given the strategic importance of growth in Wem, this is considered inappropriate and not positively prepared, justified or effective. Additionally, the group of proposed housing allocations north-west of Wem are subject to infrastructure capacity constraints (highway congestion/pinch points (including the rail crossing), being on the opposite side of the town from main employment areas, strategic road links and the railway station; and surface/foul water drainage constraints), and as such are not considered justified. Furthermore: -Proposed saved Allocation WEM003 is also not considered deliverable and may not be developable (as defined within para 67 of the National Planning Policy Framework (NPPF)) as it is undeveloped but has been allocated for a number of years and an Outline Planning Application was refused in 2020, as based on available information benefits did not outweigh visual and biodiversity harm (Appendices to this representation include material relating to this decision). -Proposed allocation WEM010 is intended to represent phase 2 of WEM003, so subject to the same uncertainties. WEM033, whilst closer to services than WEM010, is considered subject to the same highway infrastructure constraints and so also not justified. Consider WEM035 is unconstrained (as evidenced in the site assessment undertaken to inform the draft Shropshire Local Plan) far more sustainable, and deliverable/developable than proposed allocations (illustrative Plan appended to representation). It is not proposed for allocation due to its location on the opposite side of the rail line to the town centre and distance from services and facilities compared to proposed allocations (but residents of all these sites could walk to many services and facilities) and the site assessment does not consider proximity to employment areas and strategic road network (involving vehicular travel through the town centre for proposed allocations and not WEM035). Furthermore due to size, on-site provision of some services can be made (including allotments and a playground), over provision (15%) of affordable housing, 10% on-site renewable energy generation, a good housing mix and biodiversity net gain etc.
A0361	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	Support aspiration to accommodate investment and new development that contributes to meeting needs and making its settlements more sustainable. Support identification of Clun as a Community Hub as this accords with the Local Plan vision, given Clun's important role as a service centre for a wider rural hinterland. Having a 'critical mass' of households is essential to maintain vitality of services.
A0361	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2 CLU002 and CLU005	Not Specified	Yes	Not Specified	Support draft Policy S2.2, proposed allocation CLU005 (to extend existing allocation CLUN002)', proposed saved allocation CLUN002 and the draft Policy Map Inset S2 – 'Clun'. Note CLU005, together with saved allocation CLUN002, have been assessed by the Council as being unconstrained, viable and deliverable/developable. Combined these sites are large (around 80 dwelling capacity) and would make a significant contribution to the 95 dwellings proposed housing guideline for Clun. CLUN002 is currently subject to a Planning Application subject to positive discussions with Shropshire Council to address outstanding issues (relating to nitrogen) which consider can be resolved (methods of doing so documented in representation include a package treatment plant (with nitrogen scrubber and reed bed) and tree planting within the catchment (sufficient to demonstrate net gain in nitrogen removed), appendices including a site plan and wider land use plan relating to these matters appended to representation). As such, confident proposed allocation CLU005 and proposed saved allocation CLUN002 and viable and deliverable and are actively in discussion with housebuilders interested in developing the site. Note and support all the other development guidelines as set out in the supporting text.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0359	B005	N/A	Shropshire Council welcomes the support for Policy S10.1 recognising that the strategy for the Market Town of Ludlow will provide an opportunity to deliver new housing and employment development to strengthen the role and function of this Market Town and to support the rural settlements and communities in the Ludlow Place Plan area.	No
A0360	B001	N/A	Noted.	No
A0360	B002	Either: -Increase the housing guideline for Wem; or -Redistribute housing growth to alternative allocations (part of WEM035 for 40 dwellings) in the settlement to ensure housing needs of the settlement are addressed and no unacceptable adverse impacts upon existing infrastructure arise during the Plan period.	Noted. Shropshire Council considers that the proposed development strategy for Wem and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0361	B001	N/A	Noted.	No
A0361	B002	N/A	The support for the settlement strategy for Clun is welcomed and recognises that the town is appropriately designated as a Community Hub and has identified a suitable housing allocation on site CLU005 to extend the current, saved SAMDev housing allocation on site CLUN002.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0362	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	Support aspiration to accommodate investment and new development that contributes to meeting needs and making its settlements more sustainable. Identification of Craven Arms as a Key Centre accords with the Local Plan vision, given Craven Arm's strategic location on the A49 corridor with excellent connections to Shrewsbury and adjoining regions.
A0362	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Not Specified	Yes	Not Specified	Draft Policy SP14 states that the Economic Growth Strategy seeks to deliver a step change in capacity and productivity of the local economy and to contribute to this strategic corridors will be the primary focus for major development. Supporting text to draft Policy SP14 identifies Craven Arms as a Key Centre on a Strategic Corridor. As such support draft Policy SP14 as it recognises the importance of Craven Arms socially and economically.
A0362	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S7.1 ELR055 and LS2005_00002	Not Specified	Yes	Not Specified	Support draft Policy S7.1, draft Policy Map Inset S7 'Craven Arms' and saved employment land allocations ELR055 and LS2005_00002. Also support identification of a 14ha employment land guideline (including saved allocations ELR055 and LS2005_00002) to meet the needs of the town and its rural hinterland; realising the objectives of the Shropshire Economic Growth Strategy; and may also assist in enabling delivery of significant transport infrastructure improvements to the settlement, as detailed within criterion 5 of draft Policy S7.1 and its proposed explanation (committed to exploring potential funding mechanisms to deliver this infrastructure). Draft Policy S7.1 and its supporting text recognise the strategic role of Craven Arms as a primary growth point and focus for development in south Shropshire.
A0363	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.1 Oswestry ELR042	Not Specified	Yes	Not Specified	Supports ELR042
A0363	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.1 Oswestry	Not Specified	Yes	Not Specified	Support Oswestry's status and the employment land identification of 57ha
A0363	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	Support SP2, as well as Oswestry's identification as a Principal Centre
A0363	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Not Specified	Yes	Not Specified	Policy SP14 is supported as it identifies the importance of Oswestry as a significant centre for growth in Shropshire, both socially and economically.
A0364	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1	Not Specified	No	Not Specified	Too much reliance on windfall for Whitchurch. The LVSS identifies the south of the settlement as having the lowest landscape and visual sensitivity for housing development. WHT022 has a Good SA score. A recent (withdrawn) application addressed the concerns on the site relating to ecological features.
A0364	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported. The identification of Whitchurch as a Principal Centre accords with the Local Plan's vision in this regard, given Whitchurch's size, range of services, facilities and employment opportunities and its strategic location on the A49 corridor, with excellent connections to other English regions to the north.
A0365	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Pant PYC021	Not Specified	No	Not Specified	Support Pant's status as a Hub, however the guideline for the settlement is too low. Overdependence on windfall and the allocation (PYC021) for 25 dwellings which is fairly linear in nature and the highway requirements would impact the housing capacity on the site.
A0365	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	Support this policy, specifically in relation to Pant



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0362	B001	N/A	Noted.	No
A0362	B002	N/A	Shropshire Council welcomes the support for Policy SP14 as part of the employment development strategy for Shropshire which is considered to be appropriate, effective, sustainable and deliverable.	No
A0362	B003	N/A	The support is welcomed for Policy S7.1 in the draft Shropshire Local Plan setting out the settlement strategy for Craven Arms and recognising the significance of the proposed employment allocations to the role of the town and the opportunity to secure new employment in this important Key Centre and recognising the contribution this will make to the economic growth of south Shropshire.	No
A0363	B001	n/a	Noted	No
A0363	B002	n/a	Noted	No
A0363	B003	n/a	Noted.	No
A0363	B004	n/a	Shropshire Council welcomes the support for Policy SP14 as part of the employment development strategy for Shropshire which is considered to be appropriate, effective, sustainable and deliverable.	No
A0364	B001	To make the Plan 'sound' requires the allocation of additional land in Whitchurch to deliver housing. Policy S18.1 and the Whitchurch Policies Map should therefore be amended to include site WHT002, within the development boundary of the settlement and allocated for residential development for up to 50 dwellings. The allocation of this land would result in a greater level of certainty that the aims and objectives of the Plan, including the strategic growth objectives in this area of the County, will be realised over the Plan period.	Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0364	B002	n/a	Noted.	No
A0365	B001	PYC020 should be within the development boundary and potentially an allocated site for 6 dwellings	This site was assessed as part of the site assessment process, where it was considered that it "is located in an area where only very narrow roads reach, therefore there would be difficulties for HGVs etc. in accessing the site. There are also other more appropriate sites for allocation." A very minor snippet of the Conservation Area does overlap with the site at the west side.	No
A0365	B002	n/a	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0366	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Ford	Not Specified	No	Not Specified	Support Ford's allocation as a Hub, however there is too much reliance on windfall development. The Plan in its current format ignores the cluster of development in Ford around the junction of Back Lane with the A458 and therefore the opportunity to enable windfall residential development in an area centred around some of the settlements most significant services and facilities. This is a missed opportunity to provide additional windfall opportunities in a highly sustainable location within the settlement.
A0366	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	Support this policy, specifically in relation to Ford
A0366	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	It is disappointing that Policy SP8 seeks to limit development in Community Hubs, only permitting development where it "would not result in the settlement's residential guideline being exceeded" (section 1f of the policy). This section of the policy makes the guideline a ceiling figure, running counter to the National Planning Policy Framework's consistent use of housing numbers as minimums rather than maximums. It is contrary to the Government's key objective of, "significantly boosting the supply of homes" expressed in paragraph 59 of the Framework and in more recent Ministerial Statements. It makes the Local Plan's job of delivering the housing and employment development that Shropshire needs much more difficult than it needs to be. In our view, Community Hubs should be allowed the flexibility to respond to changing needs and not have artificial constraints such as a ceiling on numbers imposed on them.
A0367	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.1 Oswestry	Not Specified	No	Not Specified	Given the strategic importance of growth being directed to Oswestry such a reliance on unplanned windfall development and allocations outside of the town is considered inappropriate given the opportunity to direct some of this growth to identifiable sites in sequentially more appropriate (sustainable) locations within the town. OSW017 should be re-introduced as an allocation
A0367	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	Support this policy, specifically in relation to Oswestry
A0368	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S5.1 CST035	Not Specified	No	Not Specified	There is high demand for housing and an affordability problem in Church Stretton. The Local Plan proposes an unjustifiably low level of growth of only 200 dwellings over 22 years, equivalent to only 9 dwellings per annum over 2016-2038. The latest 2018-based household projections from the Office of National Statistics forecast a 26.9% growth in households in Shropshire over the plan period. If this county-wide growth rate is reflected in Church Stretton, it will result in demand for 534 more dwellings over the plan period. The Local Plan Delivery and Viability Study (July 2020) confirms that 23 of the 25 typologies are viable, meaning that the Local Plan needs more allocations in the South Higher area. Our client's land – CST035 – has a Good SA score and its concerns over flooding and ecological impacts have been addressed in the detailed reports under 18/01258/OUT, which was approved in Feb 2021. This site can accommodate around 20 dwellings.
A0368	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported. The identification of Church Stretton as a Key Centre accords with the Local Plan's vision in this regard, given Church Stretton's strategic location on the A49 corridor with excellent connections to Shrewsbury and adjoining regions.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0366	B001	<p>The development boundary identified on Inset Map S16a – 'Ford' is amended to include:</p> <ul style="list-style-type: none"> <li>☑ the cluster of development around the junction of Back Lane with the A458, which forms an important part of the settlement and is a sustainable location for future development; and</li> <li>☑ brownfield sites previously found by the Authority to be sustainable locations for new development and residential sites currently under construction</li> </ul> <p>This proposed extension to the development boundary of the settlement, to include the land identified on the plan at figure 1 below, will provide further opportunities for windfall development, ensuring that the needs of the settlement and its hinterland are met over the Plan period.</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Ford. Consequently, it is considered appropriate that Ford is identified as a proposed Community Hub and it is further proposed to identify a development guideline, development boundary and a housing allocation on site FRD011 consistent with other rural settlements considered to be appropriate for designation as a Community Hub for policy purposes. The development boundary around Ford reflects the need to identify an appropriate development guideline to recognise existing planned commitments in the village and to make provision for further new housing and to define an appropriate development boundary within which, this development may occur. The development boundary is focused on the area of the village directly fronting onto the A458 Trunk Road or serviced from the primary junction with the A458 at But Lane. The development boundary excludes the more sensitive areas of the village within the Conservation Area and more isolated and less accessible locations including Back Lane. The development boundary provides for the allocation at FRD011 and will permit further small scale windfall development to meet a modest allowance for the remaining plan period to 2038. The anticipated windfall development is expected to reflect the pattern of recent approvals for small housing schemes in the village. It is therefore considered that Ford is appropriately designated as a Community Hub in the draft Shropshire Local Plan and that suitable provision has been made for housing development to meet the development guideline for the village.</p>	No
A0366	B002	n/a	Noted.	No
A0366	B003	We contend that all residential guideline figures are expressed as minimums and that section 1f should be deleted from policy SP8 in its entirety.	<p>Noted. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology.</p> <p>The purpose of the draft Shropshire Local Plan to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines for proposed Community Hubs have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations.</p> <p>Para 1f of Draft Policy SP8 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such where these residential development guidelines are to be exceeded it cross-references draft Policy SP7. Draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.</p>	No
A0367	B001	OSW017 should be re-introduced as an allocation - any highway issues can be mitigated against as part of the development	The site referred to was considered appropriate in previous consultations however now the site assessment states that the: "Scale of development on this site would be minimal in terms of a contribution to the open market housing need of the town. It is acknowledged that there are issues with highways towards Upper Brook Street, however these are not substantive. It is considered that there is little rationale for an open market housing allocation in this location." Shropshire Council retains this stance.	No
A0367	B002	n/a	Noted.	No
A0368	B001	<p>To make the Plan 'sound' requires an increase in the housing requirement for Church Stretton and the allocation of land to deliver housing in a manner that protects and enhances the AONB.</p> <p>Policy S5.1 and the Church Stretton Policies Map should therefore be amended to include our client's land (reference CST035) with the development boundary of the settlement and allocated for residential development for up to 20 dwellings. The inclusion of this land would result in a greater level of certainty that the aims and objectives of the Plan, including the strategic growth objectives in this area of the County, will be realised over the Plan period.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Church Stretton and the existing commitments (including the existing allocations) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities, including its location within the Shropshire Hills AONB.</p>	No
A0368	B002	n/a	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0369	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S8.3	Not Specified	Yes	Not Specified	The designation of Elson as a Community Cluster settlement in Policy S8.3 and as identified on Inset S8, is strongly supported as this is seen as vital to ensuring the settlement's long-term future. The settlement of Elson lies in close proximity to, and has a strong relationship with, the key service centre of Ellesmere. It is also the location of significant employment premises. Elson therefore provides a highly sustainable location for the provision of additional residential development.
A0369	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported. The identification of Elson as a Community Cluster settlement accords with the Local Plan's vision in this regard, given Elson's employment opportunities and its location on the B5068 less than 1km from Ellesmere, a key service centre for this area of the County.
A0369	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	Not Specified	No	Not Specified	The current pandemic has highlighted the benefits of rural living and we anticipate greater demand for homes and business to locate in the countryside in the future. It is therefore very disappointing that section 2.c of Policy SP9 seeks to limit development in Community Clusters to "small-scale infill sites of 0.1ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings". This section runs counter to the Government's key objective of, "significantly boosting the supply of homes" expressed in paragraph 59 of the Framework and in more recent Ministerial Statements. It makes the Local Plan's job of delivering the housing development that Shropshire needs more difficult than it needs to be. In our view, Community Clusters should be allowed the flexibility to deliver larger sites with a greater number of dwellings on them, so long as the proposals do not conflict with the criteria in section 4 of policy SP9 (criteria which provide sufficient control over the delivery of new development to ensure that new development is of an appropriate scale). For the reasons set out above, the Plan fails the 'positively prepared', 'justified', 'effective' and 'consistent with National Policy' tests of soundness.
A0370	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.1	Not Specified	Yes	Not Specified	This policy is supported as it recognises the role of Much Wenlock as a service centre for a large rural hinterland and its location on a 'strategic corridor' (the A458). Paragraph 3.142(a) of the Plan identifies that the A458 is a Strategic Corridor and Policy SP14: Strategic Corridors states that the "Shropshire Economic Growth Strategy seeks to deliver a 'step change' in the capacity and productivity of the local economy. To contribute to this aim, 'Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major employment development". Whilst criterion 4(a) of policy SP14 recognises that, in order to achieve a sustainable pattern of development, employment growth in these corridors will need to be balanced with an appropriate level of housing growth. Given the above, it is evident that Much Wenlock should be a significant centre for growth in Shropshire, both socially and economically. The identification of land to the south-east the town (allocation MUW012VAR) is also supported as this land is unconstrained, lies in a highly sustainable location and will deliver substantial community benefits both on and off site by way of flood alleviation. The land will therefore make a significant and unique contribution towards meeting the growth needs of both the Town and the County.
A0371	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.1 MUW012VAR	Not Specified	Yes	Not Specified	To rely on windfall and exception sites to meet the needs of the settlement over the Plan period would fail to recognise that, without amendment to the development boundary of the settlement, windfall sites are a finite and diminishing resource and a significant reliance on such sites to meet the needs of a settlement is therefore considered to be wholly inappropriate. It is therefore considered essential that land is included within the development boundary of the town and allocated for residential development to ensure that the housing needs of the settlement and surrounding area are met, that existing issues with the built environment may be addressed and, consequently, that the aims and objectives of the Plan are realised. Given the flood modelling, it is considered evident that the proposed allocation of MUW012VAR will enable the provision of surface water drainage infrastructure that will provide a betterment by alleviating the risk of flooding in this area of the town and will assist in mitigating the effects of climate change. The implementation of a roundabout would improve the highways for the area.
A0372	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	Relaxing the requirement for Hubs to have both 'significant employment' and 'peak time public transport' makes the Hierarchy of settlements unsound. This is also contrary to the proposed Climate Change and Sustainability Objectives SO5, SO6 and SO12 which seek to reduce carbon emissions by reducing travel by private vehicles making it unsound.
A0372	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Trefonen	Not Specified	No	Not Specified	Trefonen is the only proposed Hub that does not have significant employment and peak time public transport. It would be contrary to SP3 Climate Change and Sustainability Objectives SO5, SO6 and SO12 if it was allocated hub status. This would be unsound.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0369	B001	n/a	Noted.	No
A0369	B002	n/a	Noted.	No
A0369	B003	To make the Plan 'sound' requires section 2.c of the policy to be rephrased to enable larger developments (subject to the criteria in the remainder of the policy being met). Our client's land in Elson (submitted under Shropshire's 'Call for Sites' and identified by the Council as ELS001 'Land adjoining Mayfield, Elson, Ellesmere', provides an example of a site that is larger than 0.1ha. but would otherwise accord with the criteria in the policy and should therefore be supported as a sustainable windfall development that would make a greater contribution to the overall need for housing in Shropshire. An indicative site layout is attached as an Appendix to this representation.	Noted. It is considered that the definition of infill plots provided within draft Policy SP9 is appropriate. It provides a level of certainty to local communities and the development industry about the types of sites that are suitable for such development - in terms of location, size and capacity; ensures an effective use of land; but also allows for flexibility to density, design and layout, as the referenced site size (0.1ha or less) and capacity (maximum 3 dwellings) are maximums. As such it recognises the diverse nature of Community Clusters and the settlements within them.	No
A0370	B001	n/a	Support noted.	No
A0371	B001	n/a	Shropshire Council considers that the proposed development strategy for Much Wenlock is appropriate, effective, sustainable and deliverable.	No
A0372	B001	The Hierarchy of Settlements needs to be amended to fulfil the SP3 Climate Change and Sustainability Objectives SO5, SO6 and SO12 to minimise car travel and reduce carbon emissions. The vague wording used to relax the original criteria in Para 5.41 needs to be removed and the original requirement to have both significant employment and peak time public transport must be reinstated. The Hierarchy of Settlements then needs to be reviewed using this criteria and the draft plan development status and allocations amended as appropriate.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.	No
A0372	B002	Trefonen should be removed from the Community Hub settlements and allocated as a rural settlement	Shropshire Council undertook a robust assessment during the Hierarchy of Settlement process and Trefonen's services and facilities meant that its score resulted in it being a Hub. Notably there are no housing allocations in the settlement as part of this Plan Review. A minor modification is proposed to reduce the gross housing requirement for the village over the plan period (see response to A0605)	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0373	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 SHR060	Yes	No	Yes	I do not feel this plan is sound as it proposes to create and excess of development on an area that contains established natural beauty, that has been established for centuries. The level of development is excessive and the density of housing will also be an incredible burden on the already saturated land. The water level is already rising in the local area ponds, the run off from the fields is extreme, and this development will increase this issue. Within SHR060 on its East boundary there is a large pool which is recognised within the Site Assessments of the Sustainability Appraisal (App Q p517-519). However, this fails to attract any negative scoring (p16) for what should be considered a Wildlife Site. This is the area that I think needs urgent protection.
A0374	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 SHR173	No	No	Not Specified	The NE of SHR173 is within a few metres of the SSSI but Appendix Q states it is not within 500m of a Special Area of Conservation. A Special Area of Conservation should not be treated differently to a SSSI. Building houses here will affect wildlife and conservation requirements. 450 houses seems excessive on the site, the majority of housing should be in the centre of the site.
A0375	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16	Not Specified	Yes	Not Specified	Berrington Parish Council is commenting on that part of the Local Plan that relates to Cross Houses within the Shrewsbury Rural Place Plan. The Parish Council is content with what is set out for Cross Houses of 0 allocations within the Local Plan but with windfall allowance of 9 properties. The Parish Council commented on their desire to remain as Open Countryside rather than be identified as a Hub in a previous consultation but accept that Cross Houses does meet with many of the criteria to identify it as a Hub.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0373	B001	<p>I would like to see the following:</p> <ul style="list-style-type: none"> <li>☒ Reduction in the density of housing.</li> <li>☒ Insistence on the retention of existing green spaces and natural habitats.</li> <li>☒ Creation of a green corridor that runs through the estate that enhances and protects the existing habitats, and provides a pleasant outdoor space for well being and safer recreational space.</li> <li>☒ Separate cycle paths for safe travel within and beyond the development boundary – especially for and around travel to the new schools.</li> <li>☒ Separate pedestrian paths for safe movement within and beyond the development boundary – especially for and around travel to the new schools.</li> <li>☒ The significant pond adjacent to Violet Grove and Bluebell place, which is recognised as a core/priority habitat (p518) should be given appropriate negative scores (1-3) in recognition of it being a wildlife site with diverse permeant and migrating waterfowl and amphibious creatures. This site is a Poor site for development due to the potential damage to these existing habitats, which are established and recorded on the OS maps from over 100 years ago.</li> <li>☒ The existing trees and hedgerows will not be protected with this density of development.</li> <li>☒ Proposed Key Green corridor is not in the best place and ignores the previously published Shrewsbury Big Town Plan Green Network and seems to fail to identify the significant pond to the East of SHR060 which is a significant wildlife attraction.</li> <li>☒ The Master Plan suggests building almost to the waters edge which would severely affect the migrating birds that use those fields and impact the existing permanent resident waterfowl.</li> <li>☒ This area would provide be an excellent green space and corridor and enable a nature walk around the other existing natural ponds in the area.</li> <li>☒ The proposal does not maintain the link between existing ponds and buffer as much as possible from these.</li> <li>☒ The proposal does not include a sustainable drainage plan as water levels are already an issue with them rising annually and recent heavy rain has seen streams of water flowing from the fields in SHR060 to the existing large pond.</li> <li>☒ Flood concerns and erosion for some existing properties, will only get worse when there is less natural surface run off and pools with more built-up areas.</li> <li>☒ The schools are planned to be completed before this proposed development, but other essential community services need to be guaranteed as part of the planning permission. Access for the schools is already a concern as it will be off Squinter Pip and Red Deer Road as they are too narrow, bendy and parking causes further issues. Additional Access from the new site to the school is essential.</li> <li>☒ Park and Ride towards Mytton Oak Road would be good but access from it and then through to Hanwood Road a concern.</li> <li>☒ This development in combination with the proposed inner link road will become very busy when there are issues on the A5 in peak season.</li> <li>☒ Roads already busy when A5 has congestion. The roundabout between Red Deer Road and Bank Farm is not fit for purpose now and needs serious consideration with increased traffic which will be generated. The new development will add to this congestion.</li> <li>☒ Consideration of adding traffic signals where the Hanwood Road joins the A5 as already queues from in peak times; with significant housing added this will only worsen.</li> <li>☒ Need to wait for NWRR to be completed before further development occurs, rather than this. Local centre to North of SHR158 great but must be guaranteed, still waiting for the play areas in Bowbrook and Darwin's Walk. There is no current allocation of play areas for youngsters defined on the development plan.</li> </ul>	<p>Noted. However, it is considered the proposed development guidelines for the site are appropriate and provide a comprehensive policy framework for the delivery of a masterplan for the site, and for a subsequent planning application. No change proposed.</p>	no
A0374	B001	A revision of the proposed plan moving the boundary at least 500m away from the SSSI	<p>Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>	No
A0375	B001	n/a	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0376	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	Yes	No	No	<p>Cressage should remain Open Countryside. The residents do not want it to be a Hub. An assessment should be undertaken to ascertain what the village wants, without this the council cannot understand what is right for the village. The PC should not accept Hub status. It is confusing that Cressage is not a Hub in SAMDev but is in this Local Plan. Residents have not been listened to – the Inspector should look into this issue. They should also assess how the council have evaluated consultation responses – how can 300 responses be ignored? And the scoring system should also be reviewed by them. There could be a legal challenge if the council does not take into account Covid-19 restrictions which have affected people’s ability to respond. Public libraries were unavailable during the pandemic. Why did I not receive anything in the post – why was it online only?</p> <p>There are contentious points scored in the HoS which has led to Cressage having hub status, including incorrect scoring over the library, Place of Worship, chemist/pharmacy, public transport link, peak regular services (public transport). Cressage does not have the infrastructure or services to supply the needs that the growth in housing would demand. Cressage relies on Much Wenlock and Cross Houses for many services.</p> <p>The PC are sending mixed messages to the residents on views on Hub status, and have made false accusations on the residents’ behaviour. Shropshire Council should publicise the Plan more to residents.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0376	B001	<p>I ask that the Independent inspector looks into the points scoring system and the scores Cressage received to be designated a Community Hub. There are obvious irregularities and errors which need urgently addressing. I ask that the Independent inspector looks at the previous responses to the consultation from Cressage residents. There were many hundreds of objections and it is not clear that these have been evaluated or assessed fairly by Shropshire Council. I ask the Independent inspector to evaluate the consultation process.</p> <p>I ask that the Independent inspector reviews CPRE's objections and responses and considers them in depth. I ask the Independent inspector to review Shropshire Council's consultation process during the Covid-19 pandemic and the obvious impacts that has had on preventing people from replying.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0377	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>Support proposals to provide for up to 1,500 homes attributed to meeting needs arising in the Black Country. Consider proposals for significant levels of development in Bridgnorth and Shifnal could credibly meet Black Country needs, given existing migration patterns, geographical proximity and physical links. However, likely a shortfall of land to meet Black Country housing needs will remain, even with this and likely contributions within other emerging neighbouring Local Plans.</p> <p>The Black Country evidence (Urban Capacity Review (UCR) Update 2019) demonstrates a need for 71,500 homes between 2019 and 2038, of which 44,500 homes can be accommodated in the urban area leaving a shortfall of 27,000. This shortfall is likely to increase by around 5,000 homes as a result of recent changes to the calculation of local housing need. An UCR Update 2020 will shortly be published calculating an up-to-date shortfall figure, which will inform a forthcoming consultation on the draft Black Country Plan. Evidence clearly demonstrates the Black Country cannot accommodate all of its needs in the urban area.</p> <p>Duty to cooperate discussions with neighbouring Local Authorities have resulted in a number of local authorities (including South Staffordshire, Lichfield, Cannock and Shropshire) indicating they will seek to test ability to accommodate additional housing need over and above their own as part of Local Plan Reviews (anticipate as a best-case scenario they could accommodate up to 10,500-12,500 homes, leaving a significant shortfall of approximately 14,550-16,500 houses (plus 5,000 homes as a result of the change to the calculation of local housing need).</p> <p>Currently engaging with other Local Authorities with a functional relationship (including Telford &amp; Wrekin, Solihull and Bromsgrove) and it is possible further contributions will come forward.</p> <p>In terms of non-urban capacity, assessments undertaken (Green Belt, Landscape Sensitivity, Historic Landscape Characterisation and Ecological surveys) severely constrain capacity to deliver large scale development across much of the Black Country. Market deliverability is also being assessed, but consider this will also limit capacity (based on experience in Birmingham, where capacity of an urban extension was reduced from 10,000 to 5,000 over the 15 year plan period and this was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands). The majority of the Green Belt is located in Walsall and to a lesser extent Dudley, so these are the two main housing market areas with potential for Green Belt housing, based on a scenario that there is sufficient unconstrained capacity in the Black Country Green Belt, a deliverability study may reasonably conclude capacity for some 10,000 homes in the Green Belt over the 15-year Plan period, leaving a significant shortfall to be met in neighbouring authorities. This does not reflect findings of key studies/Green Belt assessment, position will be made clearer at the forthcoming consultation on the draft Black Country Plan. However, it is clear that on the basis of the maximum capacity of the urban area, the potential contribution of neighbouring local authorities, and the indicative market capacity of the Green Belt, it is likely that the Black Country will be unable to meet its own housing land needs.</p> <p>Request the draft Shropshire Local Plan recognises there could continue to be a shortfall of land in neighbouring areas which could be accommodated within the Plan area. This must be recognised in the Plan as a key trigger for an early review of the draft Shropshire Local Plan. This approach has been used in a number of West Midlands Local Plans - most recently Wyre Forest, Stratford on Avon and North Warwickshire. Failure to include this is a serious omission and must be addressed in order for the Plan to be sound.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0377	B001	Recognise there could continue to be a shortfall of land in neighbouring areas to which could be accommodated within the Plan area. Include this as a key trigger for an early review of the draft Shropshire Local Plan.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>There is a legal requirement to review Local Plans every five years (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012). Furthermore, para 33 of the National Planning Policy Framework (NPPF) states "Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future." This requirement is also specifically recognised within para 2.16 of the introduction to the draft Shropshire Local Plan. We would also note that proposed changes to the plan making process within the Planning for the Future White Paper, if ultimately introduced, could also require a review of the Local Plan. As such, it is considered unnecessary to include a specific early review mechanism within the draft Shropshire Local Plan.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0377	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>Incorporation of 30ha of employment land to meet needs arising in the Black Country, within the overall employment land requirement is welcomed in principle. The evidence for this is set out in the Economic Development Needs Assessment (EDNA), which identifies strong labour market linkages with the Black Country and Wolverhampton in particular, and recommends close co-operation on employment land supply.</p> <p>The Black Country employment land requirement ranges from 592ha (baseline) to 870ha (aspirational growth based on WMCA SEP). Existing urban employment land supply is around 305ha, leaving a shortfall of between 263ha and 500ha, depending on the growth scenarios applied. As per housing, considering all opportunities to bring forward additional employment land within the urban area and Green Belt, but this exercise will not make a significant impact upon addressing unmet need. Contributions through the Duty to Cooperate are currently limited to 50ha in total (including the 30ha in the draft Shropshire Local Plan), but this work is ongoing and will include a proportion of the consented West Midlands Interchange at Four Ashes in South Staffordshire.</p> <p>The quantitative employment land requirement identified in the EDNA is between 164ha and 264ha (including the 30ha Black Country contribution). The current supply is some 276ha and the Plan target 300ha. This suggests there is an oversupply of land of between 138ha and 36ha, not required to meet local needs and could provide scope to increase the contribution to the Black Country further.</p> <p>Quantitatively, employment sites in Shifnal and Bridgnorth (given their location and functional relationship) could be assumed to be capable of meeting needs arising in the Black Country. Size and accessibility of proposed sites to the motorway network may limit the range of occupiers attracted to them (unlikely to be attractive to large scale and footloose inward-investment requirements). Note the EDNA recognises proximity of i54 (Junction 2 of M54) and potential for this to draw further occupiers into the County and the need to consider whether there will be enough demand to justify additional development (in addition to that already proposed as part of the i54 extension). Demand for large scale occupiers/need for additional 'strategic' employment sites will be considered in the West Midlands Strategic Sites Study and is anticipated to be completed in early 2021.</p> <p>As for housing, it is possible there could continue to be a quantitative and qualitative shortfall of employment land in neighbouring areas which could be accommodated within the Plan area. Request the draft Shropshire Local Plan recognises there could continue to be a shortfall of land in neighbouring areas which could be accommodated within the Plan area. This must be recognised in the Plan as a key trigger for an early review of the draft Shropshire Local Plan. This approach has been used in a number of West Midlands Local Plans - most recently Wyre Forest, Stratford on Avon and North Warwickshire. Failure to include this is a serious omission and must be addressed in order for the Plan to be sound.</p>
A0377	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP29, DP30, DP31, DP32 and DP33	Not Specified	Not Specified	Not Specified	<p>Evidence indicates facilities in Shropshire provide for both minerals and waste requirements arising in the Black Country.</p> <p>With regard to minerals, availability of aggregates has been in excess above minimum guidelines and the Plan does not propose any additional site allocations.</p> <p>With regard to waste, existing consented facilities are anticipated to provide sufficient capacity to accommodate forecast throughput negating the need for additional facilities.</p>
A0378	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1(1)	Yes	No	Yes	Support continued role of Market Drayton as a Principal/Key Centre, acting as a focus for strategic growth objectives in the north-east of the County. However, suggest draft Policy S11.1 should state 'at least' instead of 'around' 1,200 dwellings.
A0378	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1(2)	Yes	Yes	Yes	<p>Welcome and support the wording of para 2 of draft Policy S11.1.)</p> <p>Note that new residential development will be delivered through saved SAMDev residential allocations and proposed Local Plan residential site allocations, complemented by windfall residential development within the Town development boundary and appropriate cross-subsidy and exception (affordable) development. Welcome reference to the possibility for additional residential development outside the defined development boundary to enable delivery of proposals, such as the relocation of existing sports facilities from Greenfields Lane (para 3 of draft Policy S11.1) and the community aspiration for development of a marina at Victoria Farm (para 4 of draft Policy S11.1).</p>
A0378	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1(3)	Yes	No	Yes	<p>Note relocation of Market Drayton Sports facilities from Greenfields Lane is a central objective of the proposed Strategy. However, have serious concerns about suitability and deliverability of identified land at Longford Turning for the relocation of the existing facilities at Greenfields and the appropriateness of proposed enabling housing allocations MDR039 and MDR043.</p> <p>Promoter of MDR046 was previously asked about potential to accommodate at least some if not all of such facilities on the site. Envisaged land could be provided to the Council for sports and recreation use as part of a mixed use development that would inter alia, also deliver a marina and other beneficial proposals. Should the Longford Turning proposals subsequently be considered unsuitable/inappropriate and/or unviable or undeliverable, sports and recreational facilities can be accommodated on MDR046, as part of a mixed-use sustainable urban extension to the Town.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0377	B002	Recognise there could continue to be a shortfall of land in neighbouring areas to which could be accommodated within the Plan area. Include this as a key trigger for an early review of the draft Shropshire Local Plan. Consider an increased employment land contribution to the Black Country.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed employment land requirement and proposed employment land supply are also considered appropriate, effective and sustainable.</p> <p>The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan. The proposed employment land requirement incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan, where evidence indicates employment delivery opportunities are constrained. This reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas.</p> <p>In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038.</p> <p>There is a legal requirement to review Local Plans every five years (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012). Furthermore, para 33 of the National Planning Policy Framework (NPPF) states "Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future." This requirement is also specifically recognised within para 2.16 of the introduction to the draft Shropshire Local Plan. We would also note that proposed changes to the plan making process within the Planning for the Future White Paper, if ultimately introduced, could also require a review of the Local Plan. As such, it is considered unnecessary to include a specific early review mechanism within the draft Shropshire Local Plan.</p>	No
A0377	B003	N/A	Noted.	No
A0378	B001	Para 1 of draft Policy S11.1 should state 'at least' instead of 'around' 1,200 dwellings.	The draft Shropshire Local Plan should be read as a whole. Draft Policy SP7 recognises that residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such, draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.	No
A0378	B002	N/A	Noted.	No
A0378	B003	Should the Longford Turning proposals subsequently be considered unsuitable/inappropriate and/or unviable or undeliverable, sports and recreational facilities can be accommodated on MDR046, as part of a mixed-use sustainable urban extension to the Town.	Shropshire Council have undertaken a proportionate and robust assessment of all of the promoted sites and considers the approach taken to the preferred allocations as being reasonable and appropriate for the Local Plan. The preferred allocations are all considered as being suitable, available and achievable (including viable).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0378	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1(4)	Yes	Yes	Yes	A new marina and associated development is strongly supported by Market Drayton Town Council, Shropshire Council and the local community in Market Drayton. Draft Policy DP10 identifies requirements for new marinas. Support para 4 of draft Policy S11.1, which offers supporting policy context to realise the local community's aspirations for a marina with related uses and enabling development, at Victoria Farm. In seeking to avoid a Canal & River Trust objection to site specific proposals, 'words of comfort' instead of a specific allocation for a marina and related and enabling development at Victoria Farm are proposed. An application to and subsequent discussions with the Canal & River Trust indicate they currently have no objection in principle to a marina at Victoria Farm, subject to technical approval. In light of this supportive feedback and the Council's continued support, sufficiently encouraged to progress work on preparing a Planning Application for a marina based development, which can be considered on its merits in the context of positive wording provided at para 4 of draft Policy S11.1 and paragraph 5.155 of the explanation to draft Policy S11.1. Alternatively the site at Victoria Farm could be allocated and a similar caveat to that in draft Policy DP10 (regarding demonstrating capability of the canal network to accommodate the development) included.
A0378	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1(i) MDR012 & MDR034	Yes	Yes	Yes	Strongly support proposed allocation of MDR012 (70 dwellings) and MDR034 (120 dwellings) as they are suitable, available and deliverable early in the proposed Plan period. They also represent the most appropriate and sustainable housing development opportunities on the periphery of Market Drayton as they are well related to the existing built form, within walking distance of the town centre and enclosed by the Canal to the north/east and employment (existing/proposed) to the north/west. These proposed allocations are supported by evidence and by any objective planning assessment, are perfectly acceptable. However, confused by reference to "the proposed marina" in the draft site guidelines for both MDR012 and MDR034, even though it is not currently a proposal, but merely an aspiration. The Sustainability Appraisal (SA) incorrectly scores MDR012 as a '-' for high landscape sensitivity when it is actually medium low landscape sensitivity (reflecting enclosure of the site). This should be correct, although the sites overall rating of 'fair' remains the same. Note that MDR012 and MDR034 score higher in the SA than the other proposed allocations at Market Drayton MDR006, MDR039 and MDR043.
A0378	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1(i) MDR039 & MDR043	No	No	Yes	Relocation of the Greenfields sports and recreation facilities is a central objective of the draft Strategy for Market Drayton, but this should not be promoted at the cost of unsustainable residential development, particularly where a more suitable site (MDR046) is potentially available to accommodate this relocation. Surprised and concerned about proposals to allocate MDR039 and MDR043. Note intention to facilitate relocation of Greenfields sports and recreation facilities, but these sites have a number of potentially fatal difficulties/flaws (provision of safe and convenient pedestrian and cycleway access, unsuitable topography; significant landscape impacts and creation of unsustainable residential development) and poor physical, technical and sustainability credentials. The Site Assessments give both MDR039 and MDR043 an overall score of '-8' and 'Poor' Sustainability (the Sustainability Appraisal acknowledges they are not within walking distance of key services and facilities and have high landscape impact, resulting in the poor classification). The Strategic Land Availability Assessment (SLAA) also rejects MDR043. Further, draft Policy S11.1(3) and paras 5.153 and 5.154 of the explanation to draft Policy S11.1 suggests that the Longford Turning proposals may not be sufficiently sustainable, robust, viable and a lack of confidence in their deliverability (what feasibility evidence is available to demonstrate deliverability of MDR039 and MDR043, let alone in accordance with anticipated timescales set out in Appendix 7 of the draft Shropshire Local Plan), referring to the opportunity for potential alternative locations, which could include MDR046 (officers previously enquired about this option and the promoter agreed to it, but chose to support proposals at Longford Turning instead). Would reiterate there remains scope to accommodate the Greenfields facilities, with appropriate enabling residential development as part of a comprehensive and sustainable mixed-use development to provide a range of residential, commercial and tourist and leisure development/uses, including a marina, that combined would deliver, with much greater certainty, significant social and economic benefits with less landscape impact, at MDR046. Given the above, it is difficult to understand why MDR039 and MDR043 are proposed.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0378	B004	N/A	Noted.	No
A0378	B005	<p>Para 2 of the draft site guidelines for both MDR012 and MDR034 should be modified to read: "Pedestrian and cycle links will be enhanced or provided through the site and linking into the town and to the existing canal towpath (subject to the approval of the Canal &amp; River Trust), in order to improve the site's overall sustainability."</p> <p>This modification would facilitate linkage to any future proposals that may come forward for a marina on land at Victoria Farm, including any associated improvements to pedestrian connectivity to the north of the Canal and over the A53 to link to the towpath.</p> <p>Para 5.156 of the proposed explanation to draft Policy S11.1 should include reference to proposed allocations MDR012 and MDR034, since these are capable of being delivered early in the plan period and their promoter fully intends to bring both sites forward for housing development without delay.</p> <p>Appendix 7 of the draft Shropshire Local Plan should be amended to reflect stated objective of early delivery of MDR012 and MDR034.</p>	<p>With regard to the draft site guideline regarding pedestrian and cycle links for proposed allocations MDR012 and MDR034, a minor modification is proposed to recognise these links should also be to the canal towpath. Applicants are required to engage with the relevant bodies for their applications, and so including every appropriate body within the site guidelines would not be necessary - such aspects would be discussed during the planning application process.</p> <p>Approximate delivery rates of the sites can be found in the Appendices and so they are not all listed in the policies or explanation text. Shropshire Council generally takes a precautionary approach to assumptions on delivery timescales, as such these approximate delivery rates are considered appropriate and robust.</p>	Yes
A0378	B006	<p>Proposed allocations MDR039 and MDR043 should be deleted.</p> <p>The opportunity to relocate the Greenfields sports and recreation facilities and associated enabling residential development at MDR046, as part of a comprehensive mixed-use development associated with the delivery of the marina and related uses and enabling development.</p>	<p>Shropshire Council have undertaken a proportionate and robust assessment of all of the promoted sites and considers the approach taken to the preferred allocations as being reasonable and appropriate for the Local Plan. The preferred allocations are all considered as being suitable, available and achievable (including viable).</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0379	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16 (SHR197VAR)	Yes	No	Yes	<p>Consider an inconsistent and unjustified approach has been used to arrive at proposed allocations and draft policies meant to present a mechanism for meeting both the County's qualitative and quantitative employment needs over the plan period.</p> <p>The minimum employment land needed for Shropshire is 300ha (Oxford Economics Growth Forecast - 2016). Throughout the Local Plan Review, Shrewsbury has been the focus for development (proposed employment land guideline was 90ha but has increased to 100ha (likely to meet needs arising in the Black Country), of this 50ha was to be achieved through new allocations). However, the quantity of employment land identified for the town is inadequate to meet its strategic needs - employment allocations proposed earlier in the Local Plan Review have either not been included or their capacity has been reduced, which is extremely ill-founded, means proposed employment allocations fall below the net residual requirement for additional employment land (50ha), and as such the draft Shropshire Local Plan is contrary to para 81 of the National Planning Policy Framework (NPPF) and unsound.</p> <p>-SHR166 is subject to numerous constraints that restrict its net developable area (Council Site Assessments and Sustainability Appraisal), including: flood risk (pluvial and fluvial resulting in undevelopable elements of the site and requiring on-site surface water attenuation); ecology (abuts a Local Wildlife Site and unclear if ecological surveys of the site have occurred as may support foraging/nesting/migration); loss of agricultural land (grade 2 - best and most versatile); and heritage impact (may affect the setting of Haughmond Hill and Queen Eleanor's Bower ringwork, both Scheduled Ancient Monuments (appears Historic England objected to the site at Regulation 18) and archaeology which may need to be retained in situ limiting site capacity); landscape impact (high landscape sensitivity for employment development and visual prominence - landscape buffers will reduce capacity and limit visibility from the A49 (affecting market attractiveness)); lack of sustainable travel (detached from urban area of Shrewsbury by the river Severn and its corridor and no public rights of way or public transport links - this is at odds with the vision of the Shrewsbury Big Town Plan and results in complete reliance of the car). The Preferred Sites consultation indicated expected capacity was 18ha (net), which accords with our own analysis of constraints. This represents 40% gross to net, but would normally expect at least 60% to ensure sites effectively meet needs. This alone suggests a need for 9ha of additional employment land.</p> <p>-SHR158/SHR060/SHR161 5ha (reduced from 20ha) as part of a mixed-use sustainable urban extension (SUE). Development of the site is forecast to continue beyond the proposed Plan period and it is unclear when the employment will come forward within this - expect higher value uses in first phases. The draft Shropshire Local Plan also indicates need for upfront work (masterplanning and infrastructure assessments) prior to first delivery. Delivery will also require coordination between various landowners and stakeholders during masterplanning. As such, anticipate delivery of the employment uses will only occur later in the proposed Plan period.</p> <p>Evident that even if the proposed allocations deliver anticipate levels of development, there would be a deficit of 5ha (gross), rising to 12ha (net). Also, earliest likely delivery on them is beyond 2025. Therefore, a clear need exists for additional allocations to increase flexibility, ensure proposed targets are met and ensure the draft Shropshire Local Plan accords with the tests of soundness set out in the NPPF. Currently it is not effective in delivering employment needs of Shrewsbury or Shropshire; is not justified with reference to the evidence base; nor does it adequately reflect the desire of national policy for Local Plans to provide a clear strategy to meet their area's objective needs.</p> <p>In addition to quantitative deficits in employment land, there are also qualitative issues, as not enough is done to exploit growth of e-commerce, tech, research and food science and production industries related to the local agricultural landscape (most recent AMR demonstrates increased demand for these uses). There is a clear need for provision of smaller, modern and flexible commercial premises in Shrewsbury not satisfied by the current tapestry of draft allocations and existing commitments.</p> <p>Furthermore, a key objective of the draft Shropshire Local Plan is to support delivery of the Shropshire Economic Growth Strategy (SEGS). Its aspirations include:</p> <ul style="list-style-type: none"> <li>-Balanced growth, so identification of deliverable employment sites is just as vital to the growth of Shrewsbury as housing sites. Further, employment sites need to balance high demand for Class B2/B8 with job creation in higher value knowledge-based and research and development sectors (Class B1b and B1c in particular). According to the Shropshire AMR, growth in B1b and B1c seems to take place away from Shrewsbury across Community Hubs in rural Shropshire, likely due to the ability to deliver more bespoke units at lower market rates.</li> <li>-Step change in inward investment, but the employment strategy in the draft Shropshire Local Plan does not provide an adequate platform for this (envisaged in the SEGS).</li> <li>-Directing economic growth towards specified transport corridors and economic hubs (including Shrewsbury and the A49 corridor), SHR197VAR can directly assist this.</li> <li>-Targeting growing and under-represented sectors, including research and development and creative and digital technologies, SHR197VAR can also directly assist this.</li> </ul>
A0379	B001 Cont'd						<p>The Economic Development Needs Assessment (EDNA) identifies a shortage of sites in Shrewsbury, warning "the shortage of sites considered appropriate for development in the short term may mean that Shropshire is unable to maximise on the opportunity that the growth of e-commerce and 'reshoring' or 'on-shoring' provides". This is a clear challenge to the Council to do more to secure attractive and marketable smaller flexible premises in the early years of the proposed Plan period. But the draft Shropshire Local Plan does not allow for such a pipeline for these or other growing sectors despite the clear need identified in the evidence (proposed allocations will not deliver in the earlier proposed Plan period as documented in Appendix 7 and there is only 1 detailed application for a standalone Class B1 unit. In addition, limited land is available in Shrewsbury for anything other than traditional business park uses seeking a single-plot format premise).</p> <p>SHR197VAR (location plan appended to the site representation) is ideally suited to address quantitative and qualitative issues in the employment land supply in Shrewsbury/Shropshire. It was identified as a key proposed employment allocation (9ha) within the last Regulation 18 consultation and this represented a logical and positive response to issues raised in the Council's evidence, earlier deficiencies in the employment strategy and would have ensured employment land provision complied with para 81 of the NPPF. Substantial evidence demonstrating SHR197VAR's suitability (no physical or environmental constraints), availability, sustainability, flexibility (potential for single significant investor all the way through to incubator units for emerging tech), commerciality and deliverability (soft marketing and a local employment market report (appended to this representation) confirms commercial appeal of this site now and in the future), potential for early and quick delivery (maximum of two phases) and ability to comply with proposed Policies was provided.</p> <p>However, SHR197VAR is not included in the draft Shropshire Local Plan. Insufficient justification for its exclusion is provided. Specified reasons include difficulties caused by introduction of the new Use Class E and the site resulting in a new direction of growth at the town beyond the A49:</p> <ul style="list-style-type: none"> <li>-Consider relationship to the built form was apparent earlier in the process (and is recognised within the Strategic Land Availability Assessment) and it was still proposed for allocation within the last Regulation 18 consultation, so this issue was clearly accepted. Irrespective, terming the site a 'major new direction' due to breaching artificial boundaries formed by the strategic road network (SRN) is incorrect and ill-founded, the site would in fact consolidate an existing direction of commercial and employment growth at Battlefield Roundabout (plan provided within representation). SHR197VAR would complement the commercial uses/existing allocations (local employment market report appended to this representation) on three sides of the adjacent roundabout (one of which lies to the north, is comparable in size to SHR197VAR and already breaches the boundary defined by the SRN).</li> <li>-Concerns about ability to control end uses due to new use class E apply to all proposed allocations and can be appropriately managed. Specifically, allocations could specifically reference sub-classes of Use Class E or be carefully worded, this issue has been considered and appropriately managed at other Local Plan Examinations (examples appended to representation). There are also examples of how this issue is appropriately managed at the Planning Application stage.</li> <li>-Note that no major new constraints were identified and nothing has changed with regard to need for employment land or merits of the site.</li> </ul> <p>The draft Shropshire Local Plan is therefore:</p> <ul style="list-style-type: none"> <li>-Not positively prepared: The plan fails to provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs in respect of employment land and jobs growth. It also fails to seize a clear opportunity to allocate a deliverable and entirely suitable commercial site at one of its key employment hubs (SHR197VAR at Shrewsbury);</li> <li>-Not justified: In providing a strategy which fails to meet both the quantitative and qualitative needs of the local commercial market, and in avoiding the allocation of sites such as SHR197VAR that would significantly overcome this deficit, the strategy cannot be concluded as appropriate or one which has fully taken into account reasonable alternatives. Most importantly the strategy fails to respond to the challenges identified in the EDNA;</li> <li>-Not effective: The employment strategy of the plan does not effectively meet the identified needs of the local commercial market on either a qualitative or quantitative basis; and</li> <li>-Not consistent with national policy: Fails to provide the certainty or flexibility required by the NPPF (including para 81) that would ensure that both the immediate and long term needs of the local commercial market can be met over the lifetime of the plan.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0379	B001	<p>SHR197VAR should be allocated for at least 9ha of flexible land suitable for employment generating uses as defined by draft Policy SP13 of the draft Shropshire Local Plan.</p> <p>Proposed site guidelines for SHR197VAR appended to representation.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.</p>	No
A0379	B001 Cont'd			

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0379	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Yes	No	Yes	<p>Understand the draft Shropshire Local Plan is intended to contains mechanisms (draft Policies SP12, SP13 and SP14) to address change/shortfall in demand for employment land to be addressed on windfall sites, such SHR197VAR. However, do not consider as worded these policies (draft Policy SP14 in particular) would provide necessary flexibility to allow delivery of a multi-premises employment development of any sort of strategic scale, if a likely need were to be identified. Instead, they are only fit to secure either large single-user premises or unsustainable smaller premises, due to the requirement to identify end users from the outset. Specifically:</p> <ul style="list-style-type: none"> <li>-Draft Policy SP13 is overly restrictive other than for small-scale proposals. Major employment development (as proposed on SHR197VAR and required by the Council to supplement the short-term shortfall in supply) requires compliance with draft Policy SP14 (it must be located in a Strategic Corridor) and must also serve a named end user.</li> <li>-Draft Policy SP14 is the key draft policy in respect of delivery of additional strategic scale employment development, providing greater detail on the approach to major employment development in draft Policy SP13. It sensibly prioritises locations in close proximity to Shrewsbury/Principal/Key Centres. Of the sites in these locations it then first prioritises brownfield site with direct access to road/rail routes, these are considered very rare and if they exist should be allocated for development. It then discusses greenfield sites, but is overly restrictive, particularly with regard to the need for the proposal to deliver the greenfield site as a fully serviced and developed employment area and to meet the needs of the proposed 'end user' or occupiers. As the vast majority of enquiries are speculative (local employment market report appended to this representation confirms businesses only express interests in vacant/consented premises or for larger end users sites with outline consent/allocation where they can then specify design/layout. This is to ensure certainty that commercial needs can be met quickly), this will:</li> <li>-Not allow the Council to deliver identified shortfalls in employment land.</li> <li>-Limits prospects of successfully attracting the commercial partners sought.</li> <li>-Is cumbersome and unattractive to the development industry.</li> <li>-Would take years to see any delivery, due to the need to secure partnerships between a developer/end user.</li> <li>-Would not provide the smaller hi-tech serviced premises for which a need is identified within the Shropshire Economic Development Needs Assessment (EDNA), as these are very offer for start-ups or smaller research and development firms working on longer term projects with limited up-front cashflow.</li> <li>-Would not allow for delivery of a scheme with commercial variety (which often provides the funding for less profitable but needed types of units).</li> </ul> <p>Therefore, businesses require choice and certainty that commercial needs can be met swiftly. This will only come from the provision of a greater number of allocations or flexibility within draft Policy SP14 to allow larger sites to come forward on a more speculative basis within the burden of either a secured end user or the need for the scheme to be built out immediately. Ideally the draft Shropshire Local Plan would include both. As drafted, the strategy proposed will fail to secure step-change in the local jobs market required by Shropshire's Economic Growth Strategy or secure the minimum gross employment land requirement of 100ha at Shrewsbury over the plan period and is not sufficiently flexible to accommodate needs not anticipated in the plan so is contrary to para 81 of the NPPF and is not sound.</p> <p>The draft Shropshire Local Plan is therefore: -Not positively prepared: The plan fails to provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs in respect of employment land and jobs growth. It also fails to seize a clear opportunity to allocate a deliverable and entirely suitable commercial site at one of its key employment hubs (SHR197VAR at Shrewsbury); -Not justified: In providing a strategy which fails to meet both the quantitative and qualitative needs of the local commercial market, and in avoiding the allocation of sites such as SHR197VAR that would significantly overcome this deficit, the strategy cannot be concluded as appropriate or one which has fully taken into account reasonable alternatives. Most importantly the strategy fails to respond to the challenges identified in the EDNA; -Not effective: The employment strategy of the plan does not effectively meet the identified needs of the local commercial market on either a qualitative or quantitative basis; and -Not consistent with national policy: Fails to provide the certainty or flexibility required by the NPPF (including para 81) that would ensure that both the immediate and long term needs of the local commercial market can be met over the lifetime of the plan.</p>
A0380	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S20, S16.1	Not Specified	Not Specified	Not Specified	A plan showing details of the site locations and details of National Grid's assets is attached to this letter, relating to the proposals at Ironbridge Power Station and some of the Shrewsbury allocations
A0381	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	Not Specified	Not Specified	Not Specified	Draft Policy SP1 is aimed at providing a clear indication to future applicants of the high standards that the Council will seek to apply in managing development. The former Travis Perkins site provides an opportunity to accommodate a residential development of a high standard of design, which would contribute towards the creation of a sustainable community in the local area, address flood risk issues on the site and beyond and enhance pedestrian and cycle linkages with Shrewsbury town centre, in accordance with the objectives of this emerging policy.
A0381	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	Fully supportive of this draft policy. The residential development that is proposed on the land off Wood Street site would help Shropshire to achieve its growth aspirations, delivering well-designed new housing on a site comprising entirely of previously developed land that is currently under-utilised. It would also support the delivery of the Big Town Plan, including for example by facilitating the creation of an enhanced pedestrian and cycle connection along Bagley Brook, which is one of the key design principles identified by the Big Town Plan. Within a pre-application advice letter, the Local Planning Authority acknowledged that the site offers opportunities to improve ecological and public connectivity in the area.
A0381	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Not Specified	Not Specified	Not Specified	Draft Policy SP5 is supported. Firmly believe that the former Travis Perkins site offers a unique opportunity to deliver a residential development of a high standard of design which will enhance the character and appearance of the site, its immediate surroundings and the wider Shrewsbury town area, in accordance with the objectives of this draft policy.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0379	B002	<p>Amend paras 3 and 4 of draft Policy SP14 to more easily allow windfall employment development on greenfield sites either:</p> <ul style="list-style-type: none"> <li>-where it is demonstrated it clearly responds to the needs of the wider market rather than specifically a named end user; or</li> <li>-Where a major investment opportunity is identified that would otherwise be frustrated by adherence to the sequential approach.</li> </ul> <p>Proposed changes documented within appendix to representation.</p>	<p>Shropshire Council considers that Policy SP14 and the employment development strategy for Shropshire is appropriate, effective, sustainable and deliverable. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local Plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. In relation to the release of additional greenfield sites through the Local Plan, it is considered that sufficient flexibility has been accorded to the release of such sites along the strategic corridors. In articulating the strategic approach for the Local Plan, Policy SP14 recognises that the County has significant areas within the Green Belt and the Shropshire AONB, and a high quality environment with a rich biodiversity, landscape and historical heritage that must be afforded appropriate protection. Consequently, further development in the 'Strategic Corridors' beyond those sites already committed or proposed to be allocated for development will be determined through a sequential preference for principal settlements, strategic sites (and strategic settlements see Minor Modifications) and brownfield redevelopment opportunities with greenfield land releases to be considered only in exceptional circumstances where the benefits of the proposal will clearly justify the development of greenfield land.</p>	No
A0380	B001	n/a	Noted.	No
A0381	B001	n/a	Noted.	No
A0381	B002	n/a	Noted.	No
A0381	B003	n/a	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0381	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	Not Specified	Not Specified	Supportive of Draft Policy SP7, which states that in addition to supporting the development of housing on the allocations contained within the Local Plan, positive consideration will also be given to other sustainable housing development. It adds that additional housing development opportunities which would support the reuse of disused land or premises or contribute towards achieving wider town centre regeneration will be supported. This draft policy lends support for the residential development of the former Travis Perkins site. Although the site does contain existing buildings and extensive hard standings associated with its former use and some small-scale temporary light industrial uses that are still in operation, it is largely vacant and, in overall terms, is underutilised. Within the subsequent pre-application advice issued in January 2021, the Local Authority's Highways Team advised that the site is not suited to serve the current/former permitted land use, nor is it suited to serve an intensive commercial/employment land use. The residential development that is proposed would bring the site back into full use and would contribute positively towards the regeneration objectives for the wider town centre.
A0381	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1	Not Specified	Not Specified	Not Specified	The general thrust of this draft policy is supported.
A0382	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2	Not Specified	No	Not Specified	The draft Local Plan should allocate additional land to meet the settlement housing guideline of 200 dwellings. Further land to the North of the proposed allocation BAY039 is available, suitable and viable for residential development.
A0382	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2	Not Specified	No	Not Specified	Myddle's score in the HoS was 52 in 2017, but it was reduced to 47 in 2018, Whilst the shop closing is accepted (deducting the score by 4), Myddle lost points for not having 'multiple provision' of Children's Playground. Myddle Park has the facilities to not lose these points and thus remain the settlement at Hub status.
A0383	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	The 2017 HoS gave Morda a score of 53, in 2018 it was updated to 47. Whilst it is accepted that the Post Office has closed, there is no explanation for reducing the Public House's score from 4 to 3 and there are multiple Children's Playgrounds, therefore 4 points should not have been removed.
A0384	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0384	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0381	B004	N/A	N/A	No
A0381	B005	We consider that this policy should be amended to specifically acknowledge that residential development on under-utilised or vacant employment land that is no longer suitable for this use will be supported, particularly where it would contribute towards the regeneration objectives for the wider town centre, providing the necessary technical and environmental constraints can be satisfactorily managed.	Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0382	B001	Land to the north of allocated site BAY039 should be allocated for residential development.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers that the proposed development strategy for Bayston Hill and the existing commitments, proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. The retention of the Green Gap between Shrewsbury and Bayston Hill is considered an appropriate policy consideration. Proposed site allocations have been informed by a robust and proportionate site assessment process, including consideration of the landscape and policy considerations such as retention of Green Gaps between settlements.	No
A0382	B002	Myddle's scoring should be corrected resulting in it gaining Hub status (from 47 to 51). Subsequently, the site described in our representations should be allocated (to the rear of Glebelands) for circa 47 dwellings.	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Myddle. As such it is considered appropriate for Myddle to be identified as open countryside.	No
A0383	B001	Policy SP2 (Schedule SP2.2) of the draft Shropshire Local Plan should be amended to designate Morda Village as a Community Hub. Land should be allocated in the draft Local Plan policy S14.2 for new housing development in the village, including all or part of the land in the ownership of TSE.	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Morda. As such it is considered appropriate for Morda to be identified as open countryside.	No
A0384	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0384	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0384	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0384	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0384	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0384	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0384	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0384	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0385	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>Support the principle of the strategic approach, role of Shrewsbury as the main strategic centre with commensurate growth, and the status of Principal and Key Centres as part of a sustainable development strategy for Shropshire in draft Policy SP2. However, consider a greater proportion of growth should be directed to urban areas - based on Appendix 5 it appears around 74% of the housing requirement and 87% of the employment land requirement are directed to urban areas, but there are a number of small Community Hubs with significant development directed towards them). This is a more sustainable approach, will allow for more larger development sites (the Council should be cautious about over-reliance on smaller sites given higher rates of non-implementation), reflects the Economic Growth Strategies prioritisation of investment in strategic locations/growth zones on strategic corridors, would serve to boost economic growth in line with para 80 of the NPPF, and reflects conclusions within the Sustainability Appraisal (SA) that an urban focus is more sustainable than alternatives (a greater urban focus and higher residential guideline is not tested within the SA).</p> <p>Some development in Community Hubs is necessary to support long-term sustainability, but the scale of development should be proportionate to size and sustainability of the settlement - the proposed approach needs to be more robustly justified with reference to scale, services/facilities and accessibility to higher order settlements.</p> <p>Further information on housing trajectories for proposed allocations should be provided to justify anticipated timescales for delivery (e.g. BUR004 does not appear to have been actively promoted).</p> <p>The Strategic Housing Market Assessment (SHMA) undertaken to inform the draft Shropshire Local Plan states a housing requirement sufficient to meet affordable housing need is undeliverable, but there is an opportunity to go further towards meeting affordable housing need via additional sustainable development as part of the urban focused strategy. Additional housing land supply should be identified to provide flexibility (including in relation to changes to unmet cross-boundary need) and ensure the housing requirement is achieved. Based on Appendix 5 it appears around 30,912 dwellings have been identified against a need for 30,800 dwellings, this risks the draft Shropshire Local Plan not being effective, particularly given issues regarding lapse rates (the rate applied in the housing trajectory is unclear and must be justified. The Council's Five Year Housing Land Supply (5YS), which is not based on up-to-date evidence, includes a 10% lapse rate, but none is referenced within the Strategic Land Availability Assessment (SLAA). NPPG states an overall risk assessment should be made as to whether sites will come forward as anticipated), and windfall allowances (no evidence for windfall rates for each settlement, this must be justified in line with the NPPF and NPPG). Greater flexibility and certainty about the ability to meet local and unmet cross-boundary need can be provided by identifying additional residential/mixed use allocations in sustainable urban locations during and beyond the proposed plan period, rather than relying on windfall development. Recent Local Plan examinations have provided significant degrees of flexibility in housing land supply in case large allocations are delayed.</p> <p>The proposed housing requirement exceeds minimum local housing need (LHN) calculated using Government's standard methodology by around 19%, however a higher requirement (1,430 dwellings per annum) was previously proposed and it is not clear why this is no longer the case (this should be tested within the SA). How this 19% uplift has been determined is not documented in the LHN Assessment. It also provides no commentary on the proposed contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country.</p> <p>It is unclear whether the housing requirement and economic growth ambitions align, evidence should be clearer on this - the LHN Assessment does not identify how much uplift above LHN is required for economic growth; whilst the scenarios in the Economic Development Needs Assessment (EDNA) associated with LHN/housing requirement suggest a lower employment land requirement than that proposed in the draft Shropshire Local Plan. Should further housing growth be required to support the economic growth strategy, this would be best distributed in accordance with the urban focused strategy.</p> <p>Changes noted will ensure the plan is positively prepared, justified, effective and consistent with national policy.</p>
A0385	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	Yes	Not Specified	<p>Support the monitoring led approach to residential development beyond development boundaries proposed within draft Policy SP10. However, consider sufficient housing land supply and flexibility should be identified and prioritised.</p>
A0385	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	No	Not Specified	<p>The National Planning Policy Framework (NPPF) requires exceptional circumstances to be demonstrated to justify the release of land from the Green Belt. Note the Green Belt Exceptional Circumstances Statement (ECS), however query if the release of Green Belt land is fully justified. For instance, in relation to Shifnal, para 8.73-8.81 of the ECS notes there are potential alternative non-Green Belt options at other urban locations along the strategic growth corridor, including Shrewsbury, which could mean that in the balance a case for exceptional circumstances is not fully justified.</p> <p>Some proposed Green Belt release is for safeguarded land which can only come forward once allocated in a future Local Plan Review. Consideration of provision of further flexibility beyond the proposed Plan period, via sites which could come forwards more quickly to respond to market circumstances, should be undertaken.</p> <p>Further consideration should be given to non-Green Belt development under draft Policy SP11 to ensure the draft Shropshire Local Plan is justified and consistent with national planning policy.</p>
A0385	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12, SP13 and SP14	Not Specified	Yes	Not Specified	<p>Support the aim to provide around 300ha of employment land over the plan period and the urban focused approach to development.</p> <p>However, the objective to deliver a step change in economic productivity should be maximised by taking opportunities for a greater proportion of growth being accommodated in urban locations (particularly Shrewsbury as the Strategic Centre). Identification of additional housing growth within these locations should be supported by corresponding employment growth, recognising opportunities for mixed -use allocations at sites such as Land at Nobold.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0385	B001	<p>-Consider further flexibility in the housing requirement and housing land supply to take account of increased Black Country housing needs under the revised standard methodology.</p> <p>-Increase the proportion of development (particularly housing) directed towards urban areas.</p> <p>-Clearly demonstrate the degree of alignment between the economic growth employment land requirement and the housing requirement within the draft Shropshire Local Plan and supporting evidence.</p> <p>-Provide further flexibility to the housing land supply (directed towards urban areas in accordance with the urban focus strategy).</p> <p>-Review flexibility of the housing land supply with respect to lapse rates and windfall allowance assumptions. Reduce reliance on windfalls by securing additional allocations as part of the urban focused strategy.</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers that it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. Assumptions regarding non-delivery rates, windfall allowances and delivery timescales for proposed allocations are considered appropriate and respond to consideration of the specific characteristics, constraints and opportunities that exist across Shropshire, in specific settlements and on specific sites.</p> <p>Shropshire Council consulted on options for growth and the distribution of that growth at the Issues and Options and Preferred Scale and Distribution of Development stages of Local Plan preparation. A Sustainability Appraisal was carried out for both of these stages and is available on the Council's website.</p> <p>The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan. The proposed employment land requirement incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan, where evidence indicates employment delivery opportunities are constrained. This reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas.</p> <p>In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038.</p> <p>It is considered that an appropriate balance is achieved between the proposed housing and employment land requirements. It is important to note that the proposed employment land requirement needs to respond to numerous factors in addition to the proposed housing requirement, including: achieving key economic objectives of the strategic approach in Policy SP2, such as providing for the delivery of a growing and diverse labour force (including those which commute out of the County), and in turn supporting the delivery of an improving rate of economic growth and an increase in the productivity of the local economy; wider aspirations within the Economic Growth Strategy for Shropshire; the nature of employment development in Shropshire (including the proportion of an employment site that results in net employment floorspace); the need to off-set the re-use of existing employment land for other purposes; and the wider range of employment uses now being accepted in the draft Shropshire Local Plan.</p>	No
A0385	B002	N/A	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that it has a robust five year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. Appendix 5 illustrates this supply - identifying completions, commitments (including existing and proposed allocations) and appropriate windfall allowances (for settlements with development guidelines), which totals around 31,000 dwellings (excluding any windfall allowance for the wider rural area). The Housing Land Supply will be kept under review as part of the annual assessment of the Five Year Housing Land Supply.</p>	No
A0385	B003	<p>Exceptional circumstances for release of Green Belt should be fully justified as per the National Planning Policy Framework (NPPF).</p> <p>Alternative non-Green Belt housing land supply options for beyond the plan period should be considered within the context of the urban focused strategy (taking account of non-Green Belt land opportunities at the strategic centre of Shrewsbury).</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council also considers that exceptional circumstances, as documented within the Green Belt Exceptional Circumstances Statement, exist to justify the proposed release of land from the Green Belt.</p> <p>In accordance with national policy safeguarded land is identified to meet needs beyond the current Plan period.</p>	No
A0385	B004	N/A	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach (including in relation to achieving a step change in productivity) are appropriate, effective, sustainable and deliverable.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0385	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	No	Not Specified	<p>Whilst supportive of the principle of addressing the specific local housing needs of Shropshire in draft Policy DP1, consider further site and scheme flexibility should be provided as well as evidence for the standards, if it is to be found sound.</p> <p>The National Planning Practice Guidance (NPPG) identifies evidence to support nationally described space standards should consist of need (including what is currently being built), viability and timing; whilst evidence to support accessibility optional technical standards should include detailed information on the accessibility and adaptability of the existing stock and the size, location, type and quality of dwellings needed. It is not clear if the explanation to draft Policy DP1 and the Strategic Housing Market Assessment (SHMA) undertaken to inform the draft Shropshire Local Plan include all relevant considerations.</p> <p>The draft Shropshire Local Plan is supported by a Viability Assessment (which notes the challenging viability picture across Shropshire), however this needs to be kept under review and there is a need for site/scheme flexibility (as per para 8.10 of the Viability Assessment para 57 of the National Planning Policy Framework), which is not provided for in draft Policy DP1.</p>
A0385	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Not Specified	No	Not Specified	<p>Whilst supportive of the principle of draft Policy DP2, consider it should be amended to remove the percentage requirement to ensure it is justified, effective and consistent with national planning policy. Whilst National Planning Practice Guidance (NPPG) states policies should be supportive, there is no requirement for a specific threshold.</p> <p>The percentage requirement (10%) is based on estimated demand via the Self-Build Register. Query if this is an appropriate basis, given criteria for registration is limited and does not determine if it is a realistic ambition.</p> <p>The draft Shropshire Local Plan should consider and make reference to the use of other mechanisms such as site-specific allocations or publicly owned land, rather than relying solely upon a percentage-based policy to be met by developers.</p> <p>The potential impact upon delivery timescales of a percentage requirement also need to be considered - time is needed to sell individual self-build plots and this should be considered in terms of the effectiveness of the draft Policy.</p>
A0385	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	No	Not Specified	<p>Whilst the principle of addressing climate change via design of new dwellings is supported, consider in order for the policy to be sound it should be amended to align with the national timetable for enhanced building performance (Future Homes Standards). This will also ensure consistency with the national approach and is more effective in terms of viability.</p> <p>Support provision of flexibility in the case of viability issues resulting in the requirement being unachievable and higher standards being 'encouraged', but still have concerns about viability implications/deliverability of proposed policy requirements, given the Viability Study undertaken to inform the draft Shropshire Local Plan notes the challenging picture of viability across Shropshire and identifies the additional costs associated with these requirements.</p> <p>Consider the 10% on-site renewable energy/low-carbon energy generation requirement contradicts the energy hierarchy which prioritises energy efficiency in the first instance and will increase costs.</p> <p>It is not clear from the supporting text what evidence has informed all of these requirements e.g. local evidence on the availability, feasibility and viability of district heating and cooling systems. There are locational issues with some requirements which may mean they are not suitable in all locations (e.g. level of heat demand).</p>
A0385	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Not Specified	No	Not Specified	<p>Consider Point 3 of draft Policy DP12 should be amended to align with national requirements in order for the policy to be consistent with national planning policy.</p> <p>The National Planning Policy Framework (NPPF) only encourages developers to provide net gains and whilst the draft Environment Bill has proposed mandating 10% biodiversity net gain it should be recognised that this remains subject to Parliamentary debate, processes and Royal Assent.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0385	B005	Additional policy wording should be incorporated to provide specific site and scheme flexibility. If no evidence having regard to National Planning Practice Guidance (NPPG) criteria can be provided to justify requirements for optional technical standards, this part of the policy should be deleted.	Noted. It is considered that para's 2a/b of draft Policy DP1 provide an appropriate balance between ensuring that new development will include an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) about housing mix requirements, and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand. It is also considered that a proportionate and robust evidence base, including the Strategic Housing Market Assessment (SHMA) and Viability Study is provided to support the proposed requirements and considerations within draft Policy DP1.	No
A0385	B006	Remove reference to the specified percentage of 10% and continue to encourage provision of self build housing where it is appropriate and viable, with reference to the most up to date evidence of need within the Self Build Register. Insert clause allowing reversion of the self build plots to the site developer for market housing after 12 months of marketing for self build.	Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position. The Self-Build Register is considered a robust source of information for determining self-build housing need and is referenced as such within National Planning Practice Guidance (NPPG). Draft Policy DP2 includes a 24 month marketing timescale, which is considered appropriate.	No
A0385	B007	Remove proposed percentage requirement in relation to energy performance and renewable/low carbon energy supply and align the draft policy with emerging national Building Regulation as per the Future Homes Standard.	Subsection 1 (a) of the 2008 Planning and Energy Act states that Local Planning Authorities may include policies imposing reasonable requirements for 'a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development', provided these are consistent with national policy. National policy is the 2015 Written Ministerial Statement which allows Local Planning Authorities to set Code for Sustainable Homes level 4 energy standards. The policy reflects this standard. No change proposed.	No
A0385	B008	Remove reference to the requirement for a 10% net gain and instead make reference to a requirement for net gain in accordance with the most up to date legislative requirements.	The Queens Speech of 11th May 2021 indicated Government's intention to introduce the Environment Bill in the upcoming Parliamentary year. The key element of the Environment Bill is at least 10% biodiversity net gain. The Council is confident that this will be carried forward into law and that it is appropriate to include it in Policy DP12 to give clarity to developers, communities and the decision maker on requirements. Therefore no amendment is proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0385	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16	Not Specified	No	Not Specified	<p>Whilst supporting of the urban focused strategy, consider a higher proportion of growth (including that proposed for the Shrewsbury Place Plan Area) should be directed to Shrewsbury in order for the draft Shropshire Local Plan to be considered sound.</p> <p>Para 72 of the National Planning Policy Framework (NPPF) specifies supplying large numbers of new homes can often best be achieved through large scale development. However there are a number of key considerations including a realistic assessment of likely rates of delivery (which takes into account lead in times). In line with the NPPF the draft Shropshire Local Plan provides up to date trajectories for proposed allocations (these are high level rather than detailed), but none are provided for existing allocations key to delivering the proposed strategy. Detailed trajectories should be provided for existing and proposed allocations. Information on a sites' suitability, availability and achievability can be used to assess likely timescales as well as indicative lead-in times and build out rates, with advice of developers and local agents being important in this regard. The Council should be confident on the delivery trajectory and the need to factor in any further flexibility to ensure the housing requirements of Shrewsbury are met within the plan period. Note the proposed trajectory for proposed allocation SHR060, 158 and 181 extends throughout the proposed Plan period and beyond and parts of the site have not yet been marketed and no option agreement/developer is in place; proposed allocation SHR173 can only commence following construction of the North West Relief Road (NWRR); and proposed allocation</p> <p>There are a number of Community Hubs with a total residential guideline of 1,280 dwellings and many rely on small scale sites/windfall to achieve them (almost 50% of the guideline for Dorrington is attributed to windfall) which are more at risk of non-delivery (lapsing). A more sustainable and secure approach is focus this growth in Shrewsbury. This also aligns with para 10 of draft Policy S16.1 and would serve to deliver the ambitions of the Shrewsbury Big Town Plan.</p> <p>Land at Nobold is considered a sustainable location for development, adjacent to the existing built form of Shrewsbury with access to a range of services and facilities. It is considered suitable and available for development and is currently in agricultural use. Two concept masterplans (appendices to this representation) have been prepared for the site:</p> <p>Option 1 bounded by the A488 to north west, A5 to south and the railway line in part to the south, allows for a 138ha mixed use development (around 1,750 dwellings, a primary school, local centre and variety of open spaces north of the A5 and 18 ha employment and open space to the south).</p> <p>Option 2 bounded by the A488 to north and A5 to south, allows for a 93ha residential development (around 1,750 dwellings a primary school, local centre and variety of open spaces north of the A5).</p> <p>Both options could also provide a range of infrastructure on-site including a primary school, local centre, green infrastructure, highways infrastructure and pedestrian connectivity through and beyond the site. Land beyond the site could also be included as part of a comprehensive masterplan.</p> <p>Within the site assessment process the main reason the site (or various components of it) is not proposed for allocation is lack of a need to expand beyond the A5 (Option 1 employment - although would note presence of the railway line to the south of this area and that appropriate design/landscaping can create new boundaries) and sufficient capacity on other proposed allocations which offer greater potential benefits for the town and can support the objectives of the Big Town Plan and to achieve a comprehensively planned development. Therefore the site is not dismissed on significant suitability/availability/achievability grounds and it is considered the site can equally contribute to Council ambitions in terms of benefits to the town, achieving aspirations of the Shrewsbury Big Town Plan (particularly movement and green infrastructure) and comprehensive development (note the site assessment considers the individual parcels of Land at Nobold rather than the site comprehensively and consider comprehensive consideration should occur).</p> <p>The proximity of existing and proposed allocations demonstrates the sustainability of this location to the south-west of Shrewsbury. Land at Nobold would complement these existing and proposed allocations and is the next logical location for development. Furthermore flood risk to the east, centre and north west of town constrains these directions for growth.</p>
A0385	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S19 and S20	Not Specified	No	Not Specified	<p>Consider that in order for draft Policies S19 and S20 to be considered sound and fully justified, further evidence should be provided.</p> <p>There does not appear to be any evidence/information with the explanation to the draft Policy demonstrating how the trajectory has been derived and no updates on assessment work have been provided sites the Regulation 19 Consultation on Strategic Sites in 2019.</p> <p>Information on a sites' suitability, availability and achievability can be used to assess likely timescales as well as indicative lead-in times and build out rates, with advice of developers and local agents being important in this regard. The Council should set-out a clear delivery trajectory, be transparent on assumptions applied (which should reflect site specific considerations e.g. existing use, brownfield status and infrastructure requirements) to ensure risks to delivery are fully considered.</p> <p>If the risk assessment demonstrates such sites are likely to be delivered longer term/further beyond the plan period than anticipated, there is a need to identify further flexibility within the housing land supply by directing additional allocations to the urban locations as per the urban focused spatial strategy for development (draft Policy SP2).</p> <p>Clive Barracks may be better suited to a strategic employment allocation given its location adjacent to the A41, which the plan recognises is an important strategic corridor thereby providing greater alignment with Policy SP12.</p>
A0385	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.27	Not Specified	No	Not Specified	<p>Support proposed contributions to unmet cross-boundary housing and employment needs arising in the Black Country. However, no evidence of how these figures have been arrived at is provided and no Duty to Cooperate Statement/Statement of Common Ground (SoCG) has been published, as required by the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). NPPF states these should be maintained throughout plan production and made available by the time the draft Plan is published. Without them, it is difficult to ascertain extent of agreement with other local authorities on strategic issues (such as contributions to unmet housing need), assess appropriateness of agreements reached and determine if other factors including progress on draft Local Plans and changes to the standard method for calculating housing need (increased need in Wolverhampton (Black Country Authority) and Birmingham (in the same housing market area as the Black Country) by 35% - increasing pressure on the Black Country land supply) increase cross-boundary contributions. Therefore, further information should be provided and figures kept under review/flexibility provided in case of updated information from the Black Country changes housing need.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0385	B009	<p>-A higher proportion of the overall levels of growth, particularly housing, should be directed towards the urban locations/areas including Shrewsbury as the Strategic Centre for Shropshire/            -Within the Shrewsbury Place Plan Area a higher proportion of housing growth should be directed to the Strategic Centre of Shrewsbury versus the Community Hubs and Clusters.            -Land at Nobold should be considered for allocation as a sustainable urban extension to Shrewsbury town, providing for additional sustainable growth in line with an urban focused strategy that directs further development towards the strategic centre.            -Alternatively, Land at Nobold should be considered as a reserve site for the Plan or a direction for growth in Shrewsbury in the longer term.            -Further information should be provided on the housing trajectories for the identified housing land supply, consisting of the proposed allocations and SAMDev Plan saved allocations.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach (including in relation to achieving a step change in productivity) are appropriate, effective, sustainable and deliverable.            Shropshire Council also considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.            The draft Shropshire Local Plan and Housing Land Supply Statement present information on trajectories for the development of proposed allocations and existing SAMDev allocations as appropriate.</p>	No
A0385	B010	<p>Provide further detail to support the housing trajectory identified for Clive Barracks, Tern Hill and the Former Ironbridge Power Station, taking into account the site specific risks and constraints to delivery.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach (including in relation to achieving a step change in productivity) are appropriate, effective, sustainable and deliverable.            Shropshire Council also considers that the proposed development strategy for Clive Barracks, Tern Hill and the Former Ironbridge Power Stations are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.            The draft Shropshire Local Plan presents information on trajectories for the development of these proposed allocations, informed by discussions with and submissions from the relevant site promoters.</p>	No
A0385	B011	<p>Update and publish a Duty to Cooperate Statement and accompanying Statements of Common Ground to demonstrate extent of agreement on strategic matters and provide information on how agreements on these matters have been reached, including in relation to contributions to unmet cross-boundary need arising in the Black Country. Keep the contribution to unmet cross-boundary need arising in the Black Country under review (in light of recent changes to the standard method for calculating housing need). Consider inclusion of a mechanism committing to a review of the housing requirement if these unmet needs increase.</p>	<p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.            Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0386	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Introduction Para 2.27	Not Specified	No	Not Specified	<p>Further information is required to ensure soundness in respect of the approach to cross boundary issues. No reference to the advent of HS2 including opportunities of job creation / increased population serving local facilities for northern Shropshire towns, including Whitchurch. More recognition should be given to the positive knock-on effects of HS2 in line with Paragraph 102(b) of the NPPF.</p> <p>Support proposed contributions to unmet cross-boundary housing and employment needs arising in the Black Country. However, no evidence of how these figures have been arrived at is provided and no Duty to Cooperate Statement/Statement of Common Ground (SoCG) has been published, as required by the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). NPPF states these should be maintained throughout plan production and made available by the time the draft Plan is published. Without them, it is difficult to ascertain extent of agreement with other local authorities on strategic issues (such as contributions to unmet housing need), assess appropriateness of agreements reached and determine if other factors including progress on draft Local Plans and changes to the standard method for calculating housing need (increased need in Wolverhampton (Black Country Authority) and Birmingham (in the same housing market area as the Black Country) by 35% - increasing pressure on the Black Country land supply) increase cross-boundary contributions. Therefore, further information should be provided and figures kept under review/flexibility provided in case of updated information from the Black Country changes housing need.</p>
A0386	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>Support the principle of the strategic approach, urban focus and identification of Whitchurch as a Principal Centre (informed by the Hierarchy of Settlements Assessment/Economic Development Needs Assessment undertaken to inform the draft Shropshire Local Plan and the Shropshire Economic Growth Strategy) in draft Policy SP2. However, to ensure the draft Shropshire Local Plan is positively prepared, effective and consistent with national policy consider:</p> <p>-A greater proportion of housing growth should be directed to urban areas (based on Appendix 5 it appears around 74% of the housing requirement is directed to urban areas, but there are a number of small Community Hubs with significant development directed towards them and a higher percentage increase in the number of dwellings proposed than the urban settlements). Whilst some development in Community Hubs is necessary to support long-term sustainability, the scale of development should be proportionate to size and sustainability of the settlement. More sustainable growth would be achieved by directing more to higher order settlements, such as Whitchurch. This would also provide an opportunity to reduce reliance on smaller sites in the housing supply (subject to higher non-implementation rates). Directing more housing development to urban locations also reflects the Economic Growth Strategies prioritisation of investment in strategic locations/growth zones on strategic corridors (Whitchurch/Market Drayton are on the A41 strategic corridor), supports opportunities connected to HS2, would serve to boost economic growth in line with para 80 of the NPPF, and reflects conclusions within the Sustainability Appraisal (SA) that an urban focus is more sustainable than alternatives (a greater urban focus and higher residential guideline is not tested within the SA).</p> <p>-Additional housing land supply should be identified. This will provide flexibility (including in relation to changes to unmet cross-boundary need) and ensure the housing requirement is achieved. Based on Appendix 5 it appears around 30,912 dwellings have been identified against a need for 30,800 dwellings, this risks the draft Shropshire Local Plan not being effective, particularly given issues regarding lapse rates (the rate applied in the housing trajectory is unclear and must be justified. The Council's Five Year Housing Land Supply (5YS), which is not based on up-to-date evidence, includes a 10% lapse rate, but none is referenced within the Strategic Land Availability Assessment (SLAA). NPPG states an overall risk assessment should be made as to whether sites will come forward as anticipated), and windfall allowances (no evidence for windfall rates for each settlement, this must be justified in line with the NPPF and NPPG). Greater flexibility and certainty about the ability to meet local and unmet cross-boundary need can be provided by increased growth in sustainable urban locations, rather than relying on windfall development. Recent Local Plan examinations have provided significant degrees of flexibility in housing land supply in case large allocations are delayed.</p> <p>The proposed housing requirement exceeds minimum local housing need (LHN) calculated using Government's standard methodology by around 19%, however a higher requirement (1,430 dwellings per annum) was previously proposed and it is not clear why this is no longer the case (this should be tested within the SA). How this 19% uplift has been determined is not documented in the LHN Assessment. It also provides no commentary on the proposed contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country.</p> <p>It is unclear whether the housing requirement and economic growth ambitions align, evidence should be clearer on this - the LHN Assessment does not identify how much uplift above LHN is required for economic growth; whilst the scenarios in the Economic Development Needs Assessment (EDNA) associated with LHN/housing requirement suggest a lower employment land requirement than that proposed in the draft Shropshire Local Plan. Should further housing growth be required to support the economic growth strategy, this would be best distributed in accordance with the urban focused strategy.</p> <p>The Strategic Housing Market Assessment (SHMA) undertaken to inform the draft Shropshire Local Plan states a housing requirement sufficient to meet affordable housing need is undeliverable, but there is an opportunity to go further towards meeting affordable housing need via additional sustainable development as part of the urban focused strategy.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0386	B001	<p>Update and publish a Duty to Cooperate Statement and accompanying Statements of Common Ground to demonstrate extent of agreement on strategic matters and provide information on how agreements on these matters have been reached, including in relation to contributions to unmet cross-boundary need arising in the Black Country. Keep the contribution to unmet cross-boundary need arising in the Black Country under review (in light of recent changes to the standard method for calculating housing need). Consider inclusion of a mechanism committing to a review of the housing requirement if these unmet needs increase.</p>	<p>Shropshire Council has recognised and considered the potential opportunities associated with HS2 in the preparation of the draft Shropshire Local Plan. Draft Policy SP14 states that Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major employment development especially along 'strategic corridors' with both rail and road connectivity. One such corridor identified is the North East Shropshire and the A41 corridor supporting Shropshire's links to the Northern Powerhouse through Cheshire and connected to the delivery of HS2 later in the Local Plan period.</p> <p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p>	No
A0386	B002	<ul style="list-style-type: none"> <li>-Consider further flexibility in the housing requirement and housing land supply to take account of increased Black Country housing needs under the revised standard methodology.</li> <li>-Increase the proportion of development (particularly housing) directed towards urban areas.</li> <li>-The Sustainability Appraisal (SA) should consider a scenario involving higher growth directed to urban areas (more than 75%).</li> <li>-Clearly demonstrate the degree of alignment between the economic growth employment land requirement and the housing requirement within the draft Shropshire Local Plan and supporting evidence.</li> <li>-Provide further flexibility to the housing land supply (directed towards urban areas in accordance with the urban focus strategy).</li> <li>-Review flexibility of the housing land supply with respect to lapse rates and windfall allowance assumptions. Reduce reliance on windfalls by securing additional allocations as part of the urban focused strategy.</li> </ul>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers that it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. Assumptions regarding non-delivery rates, windfall allowances and delivery timescales for proposed allocations are considered appropriate and respond to consideration of the specific characteristics, constraints and opportunities that exist across Shropshire, in specific settlements and on specific sites. Shropshire Council consulted on options for growth and the distribution of that growth at the Issues and Options and Preferred Scale and Distribution of Development stages of Local Plan preparation. A Sustainability Appraisal was carried out for both of these stages and is available on the Council's website.</p> <p>The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan.</p> <p>The proposed employment land requirement incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan, where evidence indicates employment delivery opportunities are constrained. This reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas. In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038. It is considered that an appropriate balance is achieved between the proposed housing and employment land requirements. It is important to note that the proposed employment land requirement needs to respond to numerous factors in addition to the proposed housing requirement, including: achieving key economic objectives of the strategic approach in Policy SP2, such as providing for the delivery of a growing and diverse labour force (including those which commute out of the County), and in turn supporting the delivery of an improving rate of economic growth and an increase in the productivity of the local economy; wider aspirations within the Economic Growth Strategy for Shropshire; the nature of employment development in Shropshire (including the proportion of an employment site that results in net employment floorspace); the need to off-set the re-use of existing employment land for other purposes; and the wider range of employment uses now</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0386	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	No	Not Specified	<p>Whilst supportive of the principle of addressing the specific local housing needs of Shropshire in draft Policy DP1, consider further site and scheme flexibility should be provided as well as evidence for the standards, if it is to be found sound.</p> <p>The National Planning Practice Guidance (NPPG) identifies evidence to support nationally described space standards should consist of need (including what is currently being built), viability and timing; whilst evidence to support accessibility optional technical standards should include detailed information on the accessibility and adaptability of the existing stock and the size, location, type and quality of dwellings needed. It is not clear if the explanation to draft Policy DP1 and the Strategic Housing Market Assessment (SHMA) undertaken to inform the draft Shropshire Local Plan include all relevant considerations.</p> <p>The draft Shropshire Local Plan is supported by a Viability Assessment (which notes the challenging viability picture across Shropshire), however this needs to be kept under review and there is a need for site/scheme flexibility (as per para 8.10 of the Viability Assessment para 57 of the National Planning Policy Framework), which is not provided for in draft Policy DP1.</p>
A0386	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Not Specified	No	Not Specified	<p>Whilst supportive of the principle of draft Policy DP2, consider it should be amended to remove the percentage requirement to ensure it is justified, effective and consistent with national planning policy. Whilst National Planning Practice Guidance (NPPG) states policies should be supportive, there is no requirement for a specific threshold.</p> <p>The percentage requirement (10%) is based on estimated demand via the Self-Build Register. Query if this is an appropriate basis, given criteria for registration is limited and does not determine if it is a realistic ambition.</p> <p>The draft Shropshire Local Plan should consider and make reference to the use of other mechanisms such as site-specific allocations or publicly owned land, rather than relying solely upon a percentage-based policy to be met by developers.</p> <p>The potential impact upon delivery timescales of a percentage requirement also need to be considered - time is needed to sell individual self-build plots and this should be considered in terms of the effectiveness of the draft Policy.</p>
A0386	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	No	Not Specified	<p>Support the approach proposed in draft Policy DP3. The affordable housing requirement (10% in the north and 20% in the south) is supported by the Strategic Housing Market Assessment (SHMA) and Viability Assessment. However, consider the Council should ensure all anticipated development costs associated with draft Policies in the draft Shropshire Local Plan have been taken into account (in accordance with the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG)). This will ensure the draft Shropshire Local Plan is justified, effective and consistent with national planning policy. Whilst the Viability Assessment undertaken to inform the draft Shropshire Local Plan appears to reflect these considerations it notes the need for the assessment to be kept under review, particularly in light of the COVID-19 pandemic and Brexit.</p> <p>Recognise viability is to be considered 'up front' as part of the Local Plan process, nevertheless, as the Viability Assessment undertaken represents primarily a typology-based approach, draft policies should continue to offer site and scheme specific flexibility (as per para 57 of the NPPF). As such, reference within draft Policy DP3 to site specific viability assessments being taken into account in exceptional circumstances is considered to meet the tests of soundness in para 35 of the NPPF, in that it is consistent with national policy. It is therefore supported.</p>
A0386	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	No	Not Specified	<p>Whilst the principle of addressing climate change via design of new dwellings is supported, consider in order for the policy to be sound it should be amended to align with the national timetable for enhanced building performance (Future Homes Standards). This will also ensure consistency with the national approach and is more effective in terms of viability.</p> <p>Support provision of flexibility in relation to viability issues and higher standards being 'encouraged', but still have concerns about deliverability implications of proposed policy requirements, given the Viability Study undertaken to inform the draft Shropshire Local Plan notes the challenging picture of viability across Shropshire and identifies the additional costs associated with these requirements.</p> <p>Consider the 10% on-site renewable energy/low-carbon energy generation requirement contradicts the energy hierarchy which prioritises energy efficiency in the first instance. It is not clear from the supporting text what evidence has informed all of these requirements e.g. local evidence on the availability, feasibility and viability of district heating and cooling systems. There are locational issues with some requirements which may mean they are not suitable in all locations (e.g. level of heat demand) and consider district heating is only potentially viable on low-rise schemes of 800 or more dwellings and physical/ownership/take-up barriers exist that should be recognised in the supporting text. As such further flexibility should be provided stating such technologies will only be encouraged where they are clearly viable, based on local evidence, in order to make the policy effective, justifiable and in line with national policy.</p>
A0386	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Not Specified	No	Not Specified	<p>Consider Point 3 of draft Policy DP12 should be amended to align with national requirements in order for the policy to be consistent with national planning policy.</p> <p>The National Planning Policy Framework (NPPF) only encourages developers to provide net gains and whilst the draft Environment Bill has proposed mandating 10% biodiversity net gain it should be recognised that this remains subject to Parliamentary debate, processes and Royal Assent.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0386	B003	Additional policy wording should be incorporated to provide specific site and scheme flexibility. If no evidence having regard to National Planning Practice Guidance (NPPG) criteria can be provided to justify requirements for optional technical standards, this part of the policy should be deleted.	Noted. It is considered that para's 2a/b of draft Policy DP1 provide an appropriate balance between ensuring that new development will include an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) about housing mix requirements, and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand. It is also considered that a proportionate and robust evidence base, including the Strategic Housing Market Assessment (SHMA) and Viability Study is provided to support the proposed requirements and considerations within draft Policy DP1.	No
A0386	B004	Remove reference to the specified percentage of 10% and continue to encourage provision of self build housing where it is appropriate and viable, with reference to the most up to date evidence of need within the Self Build Register. Insert clause allowing reversion of the self build plots to the site developer for market housing after 12 months of marketing for self build.	Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position. Draft Policy DP2 includes a 24 month marketing timescale, which is considered appropriate.	No
A0386	B005	N/A	Noted.	No
A0386	B006	Remove proposed percentage requirement in relation to energy performance and renewable/low carbon energy supply and align the draft policy with emerging national Building Regulation as per the Future Homes Standard.	Subsection 1 (a) of the 2008 Planning and Energy Act states that Local Planning Authorities may include policies imposing reasonable requirements for 'a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development', provided these are consistent with national policy. National policy is the 2015 Written Ministerial Statement which allows Local Planning Authorities to set Code for Sustainable Homes level 4 energy standards. The policy reflects this standard. No change proposed. Although the government announced its intention to amend Subsection 1 (c) of the 2008 Planning and Energy Act in 2015 - which states that Local Planning Authorities may include policies imposing reasonable requirements for 'development in their area to comply with energy efficiency standards that exceed the energy requirements of the building regulations' - these amendments have not yet been enacted. The intention of the amendment was to introduce higher energy performance requirements through building regulations, rather than the planning system. The performance increase was expected to be a 19% improvement. This improvement is also referenced in national policy through the 2015 Written Ministerial Statement - being equivalent to the Code for Sustainable Homes level 4 energy criteria which the Statement permits. However, the government's 2015 Productivity Plan subsequently stated that 'the government does not intend to proceed with .....the proposed increase in on-site energy efficiency standards, but will keep energy efficiency standards under review recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.' Recent government consultations on the Future Homes Standard and Future Buildings Standard indicate that such a review is ongoing with the outcome forming part of changes to Part L of the Building Regulations. However, these changes have not yet been made. Thus the Council believes that the powers afforded to LPAs through the 2008 Planning and Energy Act to set energy efficiency standards in new homes still exist and that this policy's requirements are appropriate. Provision is also made in the policy for higher Building Regulations standards to apply if/when these are implemented. No change proposed.	No
A0386	B007	Remove reference to the requirement for a 10% net gain and instead make reference to a requirement for net gain in accordance with the most up to date legislative requirements.	The Queens Speech of 11th May 2021 indicated Government's intention to introduce the Environment Bill in the upcoming Parliamentary year. The key element of the Environment Bill is at least 10% biodiversity net gain. The Council is confident that this will be carried forward into law and that it is appropriate to include it in Policy DP12 to give clarity to developers, communities and the decision maker on requirements. Therefore no amendment is proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0386	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18	Not Specified	No	Not Specified	<p>Support proposed residential allocation WHT037 &amp; WHT044. They represent a logical solution to meeting housing need at Whitchurch; the adjoin residential development on existing SAMDev allocation WHIT046 (natural second phase/extension and complementary to this site); they are accessible to existing transport networks, local facilities/services; and are a sustainable location for residential development. A Vision Document/Concept Plan form an appendix to the representation and demonstrate site suitability and how the site can sustainably and comprehensively developed meeting housing needs and also providing appropriate connectivity, landscaping, open space &amp; sustainable drainage technologies to prevent flooding. The site can be delivered early in the proposed Plan period.</p> <p>However would welcome the following minor amendments:</p> <ul style="list-style-type: none"> <li>-Increase the proposed capacity from 200 dwellings to 215 dwellings (reflecting strategic objectives of the draft Shropshire Local Plan, the sites sustainable location and that this can be delivered whilst also meeting policy required open space/biodiversity mitigation) It would also increase effectiveness and alignment with the National Planning Policy Framework (NPPF) and provide greater certainty about housing land supply (reducing reliance on windfall).</li> <li>-Query guideline related to quality, design, mix and layout as there is no assessment of impact of different housing mix provisions on viability, a consistent theme in Planning Appeal Decisions regarding Planning Authority attempts to impose a housing mix on market dwellings. There is also no reference to demand, a key component of housing provision.</li> </ul> <p>Remaining development guidelines are in line with proposals submitted to date and supported. Detailed requirements should be informed by additional site specific evidence as part of the Planning Application process.</p> <p>Comments on other policies relevant in the site-specific context.</p>
A0387	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Introduction	Not Specified	No	Not Specified	<p>No reference is made to the advent of HS2 including opportunities of job creation / increased population serving local facilities for northern Shropshire towns, including Market Drayton. More recognition should be given to the positive knock-on effects of HS2 in line with Paragraph 102(b) of the NPPF.</p> <p>Whilst supportive of the Council seeking to address cross-boundary issues including accommodating unmet needs, consider that the current approach is unsound as it is not fully positively prepared or consistent with national planning policy. Specifically, support proposed contributions to unmet cross-boundary housing and employment needs arising in the Black Country. However, no evidence of how these figures have been arrived at is provided and no Duty to Cooperate Statement/Statement of Common Ground (SoCG) has been published, as required by the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). NPPF states these should be maintained throughout plan production and made available by the time the draft Plan is published. Without them, it is difficult to ascertain extent of agreement with other local authorities on strategic issues (such as contributions to unmet housing need), assess appropriateness of agreements reached and determine if other factors including progress on draft Local Plans and changes to the standard method for calculating housing need (increased need in Wolverhampton (Black Country Authority) and Birmingham (in the same housing market area as the Black Country) by 35% - increasing pressure on the Black Country land supply) increase cross-boundary contributions. Therefore, further information should be provided and figures kept under review/flexibility provided in case of updated information from the Black Country changes housing need.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0386	B008	<p>The overall capacity of WHT037 &amp; WHT044 should be amended from 200 to 215 dwellings.</p> <p>The first proposed site guideline for WHT037 &amp; WHT044 should be amended to provide further clarity on housing mix, with a reference included to demand; or alternatively deletion of the reference to 'identified local needs'.</p>	<p>Noted. Para 6 of Draft Policy S18.1 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.</p> <p>Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p> <p>The draft site guidelines for proposed allocation WHT037 &amp; WHT044, including those relating to residential mix, are also considered appropriate. Furthermore, the draft Shropshire Local Plan should be read as a whole. Draft Policy DP1 specifically addresses residential mix.</p>	No
A0387	B001	<p>Reference HS2 and the associated opportunities within the introduction of the draft Shropshire Local Plan.</p> <p>Update and publish a Duty to Cooperate Statement and accompanying Statements of Common Ground to demonstrate extent of agreement on strategic matters and provide information on how agreements on these matters have been reached, including in relation to contributions to unmet cross-boundary need arising in the Black Country.</p> <p>Keep the contribution to unmet cross-boundary need arising in the Black Country under review (in light of recent changes to the standard method for calculating housing need).</p> <p>Consider inclusion of a mechanism committing to a review of the housing requirement if these unmet needs increase.</p>	<p>Shropshire Council does not consider it necessary or appropriate to reference all infrastructure projects within the introduction of the draft Shropshire Local Plan. However, the Council has recognised and considered the potential opportunities associated with HS2 in the preparation of the draft Shropshire Local Plan. Draft Policy SP14 states that Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major employment development especially along 'strategic corridors' with both rail and road connectivity. One such corridor identified is the North East Shropshire and the A41 corridor supporting Shropshire's links to the Northern Powerhouse through Cheshire and connected to the delivery of HS2 later in the Local Plan period.</p> <p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0387	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>Support identification of Market Drayton as a Principal Centre and Longslow as a Community Cluster (given the need to deliver proportionate development to support rural vitality and its proximity to Market Drayton).</p> <p>Support the principle of the strategic approach, but object to the level and apportionment of growth currently identified which is considered unsound (not fully positively prepared, justified, effective or consistent with national planning policy). Specifically more development should be focused in higher order settlements such as Market Drayton and less in Community Hubs. Based on Appendix 5 it appears around 74% of the housing requirement is directed to urban areas, but there are a number of small Community Hubs with significant development directed towards them and a higher percentage increase in the number of dwellings proposed than the urban settlements. Whilst some development in Community Hubs is necessary to support long-term sustainability, the scale of development should be proportionate to size and sustainability of the settlement and more robustly justified. Focusing more development in higher order settlement would also provide an opportunity to reduce reliance on smaller sites in the housing supply (subject to higher non-implementation rates), reflects the Economic Growth Strategies prioritisation of investment in strategic locations/growth zones on strategic corridors (Whitchurch/Market Drayton are on the A41 strategic corridor), supports opportunities connected to HS2 and would serve to boost economic growth in line with para 80 of the NPPF, and reflects conclusions within the Sustainability Appraisal (SA) that an urban focus is more sustainable than alternatives (a greater urban focus and higher residential guideline is not tested within the SA).</p> <p>The proposed housing requirement exceeds minimum local housing need (LHN) calculated using Government's standard methodology by around 19%, however a higher requirement (1,430 dwellings per annum) was previously proposed and it is not clear why this is no longer the case (this should be tested within the SA). How this 19% uplift has been determined is not documented in the LHN Assessment. It also provides no commentary on the proposed contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country.</p> <p>It is unclear whether the housing requirement and economic growth ambitions align, evidence should be clearer on this - the LHN Assessment does not identify how much uplift above LHN is required for economic growth; whilst the scenarios in the Economic Development Needs Assessment (EDNA) associated with LHN/housing requirement suggest a lower employment land requirement than that proposed in the draft Shropshire Local Plan. Should further housing growth be required to support the economic growth strategy, this would be best distributed in accordance with the urban focused strategy.</p> <p>The Strategic Housing Market Assessment (SHMA) undertaken to inform the draft Shropshire Local Plan states a housing requirement sufficient to meet affordable housing need is undeliverable, but there is an opportunity to go further towards meeting affordable housing need via additional sustainable development as part of the urban focused strategy. Additional housing land supply should be identified. This will provide flexibility (including in relation to changes to unmet cross-boundary need) and ensure the housing requirement is achieved. Based on Appendix 5 it appears around 30,912 dwellings have been identified against a need for 30,800 dwellings, this risks the draft Shropshire Local Plan not being effective, particularly given issues regarding lapse rates (the rate applied in the housing trajectory is unclear and must be justified. The Council's Five Year Housing Land Supply (5YS), which is not based on up-to-date evidence, includes a 10% lapse rate, but none is referenced within the Strategic Land Availability Assessment (SLAA). NPPG states an overall risk assessment should be made as to whether sites will come forward as anticipated), and windfall allowances (no evidence for windfall rates for each settlement, this must be justified in line with the NPPF and NPPG). Greater flexibility and certainty about the ability to meet local and unmet cross-boundary need can be provided by increased growth in sustainable urban locations, rather than relying on windfall development. Recent Local Plan examinations have provided significant degrees of flexibility in housing land supply in case large allocations are delayed.</p>
A0387	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	Yes	Not Specified	Support the monitoring led approach to residential development beyond development boundaries proposed within draft Policy SP10. However, consider sufficient housing land supply and flexibility should be identified and prioritised.
A0387	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	No	Not Specified	<p>The National Planning Policy Framework (NPPF) requires exceptional circumstances to be demonstrated to justify the release of land from the Green Belt. Note the Green Belt Exceptional Circumstances Statement (ECS), however query if the release of Green Belt land is fully justified. For instance, in relation to Shifnal, para 8.73-8.81 of the ECS notes there are potential alternative non-Green Belt options at other urban locations along the strategic growth corridor, including Shrewsbury, which could mean that in the balance a case for exceptional circumstances is not fully justified.</p> <p>Some proposed Green Belt release is for safeguarded land which can only come forward once allocated in a future Local Plan Review. Consideration of provision of further flexibility beyond the proposed Plan period, via sites which could come forwards more quickly to respond to market circumstances, should be undertaken.</p> <p>Further consideration should be given to non-Green Belt development under draft Policy SP11 to ensure the draft Shropshire Local Plan is justified and consistent with national planning policy.</p>
A0387	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12, SP13 and SP14	Not Specified	Yes	Not Specified	Support the aim to provide around 300ha of employment land over the plan period and the urban focused approach to development. However, the objective to deliver a step change in economic productivity should be maximised by taking opportunities for a greater proportion of growth being accommodated in urban locations (including Market Drayton as the Principal Centre) and recognising the potential of non-Green Belt sites to deliver additional housing land supply.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0387	B002	<p>-Consider further flexibility in the housing requirement and housing land supply to take account of increased Black Country housing needs under the revised standard methodology.</p> <p>-Increase the proportion of development (particularly housing) directed towards urban areas.</p> <p>-Clearly demonstrate the degree of alignment between the economic growth employment land requirement and the housing requirement within the draft Shropshire Local Plan and supporting evidence.</p> <p>-Provide further flexibility to the housing land supply (directed towards urban areas in accordance with the urban focus strategy).</p> <p>-Review flexibility of the housing land supply with respect to lapse rates and windfall allowance assumptions. Reduce reliance on windfalls by securing additional allocations as part of the urban focused strategy.</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council also considers that it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. Assumptions regarding non-delivery rates, windfall allowances and delivery timescales for proposed allocations are considered appropriate and respond to consideration of the specific characteristics, constraints and opportunities that exist across Shropshire, in specific settlements and on specific sites.</p> <p>Shropshire Council consulted on options for growth and the distribution of that growth at the Issues and Options and Preferred Scale and Distribution of Development stages of Local Plan preparation. A Sustainability Appraisal was carried out for both of these stages and is available on the Council's website. The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan.</p> <p>The proposed employment land requirement incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan, where evidence indicates employment delivery opportunities are constrained. This reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas.</p> <p>In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038.</p> <p>It is considered that an appropriate balance is achieved between the proposed housing and employment land requirements. It is important to note that the proposed employment land requirement needs to respond to numerous factors in addition to the proposed housing requirement, including: achieving key economic objectives of the strategic approach in Policy SP2, such as providing for the delivery of a growing and diverse labour force (including those which commute out of the County), and in turn supporting the delivery of an improving rate of economic growth and an increase in the productivity of the local economy; wider aspirations within the Economic Growth Strategy for Shropshire; the nature of employment development in Shropshire (including the</p>	No
A0387	B003	N/A	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that it has a robust five year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. Appendix 5 illustrates this supply - identifying completions, commitments (including existing and proposed allocations) and appropriate windfall allowances (for settlements with development guidelines), which totals around 31,000 dwellings (excluding any windfall allowance for the wider rural area). The Housing Land Supply will be kept under review as part of the annual assessment of the Five Year Housing Land Supply.</p>	No
A0387	B004	<p>Exceptional circumstances for release of Green Belt should be fully justified as per the National Planning Policy Framework (NPPF).</p> <p>Alternative non-Green Belt housing land supply options for beyond the plan period should be considered within the context of the urban focused strategy (taking account of non-Green Belt land opportunities at the strategic centre of Shrewsbury).</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council also considers that exceptional circumstances, as documented within the Green Belt Exceptional Circumstances Statement, exist to justify the proposed release of land from the Green Belt.</p> <p>In accordance with national policy safeguarded land is identified to meet needs beyond the current Plan period.</p>	No
A0387	B005	N/A	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach (including in relation to achieving a step change in productivity) are appropriate, effective, sustainable and deliverable.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0387	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	No	Not Specified	<p>Whilst supportive of the principle of addressing the specific local housing needs of Shropshire in draft Policy DP1, consider as drafted the policy is unsound as it is not justified, effective or consistent with national planning policy.</p> <p>The National Planning Practice Guidance (NPPG) identifies evidence to support nationally described space standards should consist of need (including what is currently being built), viability and timing; whilst evidence to support accessibility optional technical standards should include detailed information on the accessibility and adaptability of the existing stock and the size, location, type and quality of dwellings needed. It is not clear if the explanation to draft Policy DP1 and the Strategic Housing Market Assessment (SHMA) undertaken to inform the draft Shropshire Local Plan include all relevant considerations.</p> <p>The draft Shropshire Local Plan is supported by a Viability Assessment (which notes the challenging viability picture across Shropshire and the implications of policies requirements in draft Policy DP1), however this needs to be kept under review and there is a need for site/scheme flexibility (as per para 8.10 of the Viability Assessment para 57 of the National Planning Policy Framework), which is not provided for in draft Policy DP1.</p>
A0387	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Not Specified	No	Not Specified	<p>Whilst supportive of the principle of draft Policy DP2, consider as drafted it is unsound as it is not fully justified, effective or consistent with national planning policy.</p> <p>Whilst National Planning Practice Guidance (NPPG) states policies should be supportive, there is no requirement for a specific threshold.</p> <p>The percentage requirement (10%) is based on estimated demand via the Self-Build Register. Query if this is an appropriate basis, given criteria for registration is limited and does not determine if it is a realistic ambition.</p> <p>The draft Shropshire Local Plan should consider and make reference to the use of other mechanisms such as site-specific allocations or publicly owned land, rather than relying solely upon a percentage-based policy to be met by developers.</p> <p>Any requirement for self-build needs to be carefully worded to reflect viability constraints and potential for non-delivery (and flexibility for this to revert to market/affordable housing).</p>
A0387	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	No	Not Specified	<p>Whilst the principle of addressing climate change via design of new dwellings is supported, consider the current proposed policy approved is unsound as it is not justified, effective or consistent with national planning policy.</p> <p>The draft policy should be amended to align with the national timetable for enhanced building performance (Future Homes Standards). This will also ensure consistency with the national approach and is more effective in terms of viability.</p> <p>Support provision of flexibility in the case of viability issues resulting in the requirement being unachievable and higher standards being 'encouraged', but still have concerns about viability implications/deliverability of proposed policy requirements, given the Viability Study undertaken to inform the draft Shropshire Local Plan notes the challenging picture of viability across Shropshire and identifies the additional costs associated with these requirements.</p> <p>Consider the 10% on-site renewable energy/low-carbon energy generation requirement contradicts the energy hierarchy which prioritises energy efficiency in the first instance and will increase costs.</p> <p>It is not clear from the supporting text what evidence has informed all of these requirements e.g. local evidence on the availability, feasibility and viability of district heating and cooling systems. There are locational issues with some requirements which may mean they are not suitable in all locations (e.g. level of heat demand).</p>
A0387	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Not Specified	No	Not Specified	<p>Consider Point 3 of draft Policy DP12 is unsound as it is not consistent with national policy. It should be amended to align with national requirements in order for the policy to be consistent with national planning policy.</p> <p>The National Planning Policy Framework (NPPF) only encourages developers to provide net gains and whilst the draft Environment Bill has proposed mandating 10% biodiversity net gain it should be recognised that this remains subject to Parliamentary debate, processes and Royal Assent.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0387	B006	Additional policy wording should be incorporated to provide specific site and scheme flexibility. Requirements for optional technical standards should be fully justified by the evidence base, having regard to National Planning Practice Guidance (NPPG) criteria.	Noted. It is considered that para's 2a/b of draft Policy DP1 provide an appropriate balance between ensuring that new development will include an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) about housing mix requirements, and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand. It is also considered that a proportionate and robust evidence base, including the Strategic Housing Market Assessment (SHMA) and Viability Study is provided to support the proposed requirements and considerations within draft Policy DP1.	No
A0387	B007	Remove reference to the specified percentage of 10% and continue to encourage provision of self build housing where it is appropriate and viable, with reference to the most up to date evidence of need within the Self Build Register. Insert clause allowing reversion of the self build plots to the site developer for market housing after 12 months of marketing for self build.	Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position. Draft Policy DP2 includes a 24 month marketing timescale, which is considered appropriate.	No
A0387	B008	Remove proposed percentage requirement in relation to energy performance and renewable/low carbon energy supply and align the draft policy with emerging national Building Regulation as per the Future Homes Standard.	Subsection 1 (a) of the 2008 Planning and Energy Act states that Local Planning Authorities may include policies imposing reasonable requirements for 'a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development', provided these are consistent with national policy. National policy is the 2015 Written Ministerial Statement which allows Local Planning Authorities to set Code for Sustainable Homes level 4 energy standards. The policy reflects this standard. No change proposed.  Although the government announced its intention to amend Subsection 1 (c) of the 2008 Planning and Energy Act in 2015 - which states that Local Planning Authorities may include policies imposing reasonable requirements for 'development in their area to comply with energy efficiency standards that exceed the energy requirements of the building regulations' - these amendments have not yet been enacted. The intention of the amendment was to introduce higher energy performance requirements through building regulations, rather than the planning system. The performance increase was expected to be a 19% improvement. This improvement is also referenced in national policy through the 2015 Written Ministerial Statement - being equivalent to the Code for Sustainable Homes level 4 energy criteria which the Statement permits. However, the government's 2015 Productivity Plan subsequently stated that 'the government does not intend to proceed with .....the proposed increase in on-site energy efficiency standards, but will keep energy efficiency standards under review recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.' Recent government consultations on the Future Homes Standard and Future Buildings Standard indicate that such a review is ongoing with the outcome forming part of changes to Part L of the Building Regulations. However, these changes have not yet been made. Thus the Council believes that the powers afforded to LPAs through the 2008 Planning and Energy Act to set energy efficiency standards in new homes still exist and that this policy's requirements are appropriate. Provision is also made in the policy for higher Building Regulations standards to apply if/when these are implemented. No change proposed.	No
A0387	B009	Remove reference to the requirement for a 10% net gain and instead make reference to a requirement for net gain in accordance with the most up to date legislative requirements.	The Queens Speech of 11th May 2021 indicated Government's intention to introduce the Environment Bill in the upcoming Parliamentary year. The key element of the Environment Bill is at least 10% biodiversity net gain. The Council is confident that this will be carried forward into law and that it is appropriate to include it in Policy DP12 to give clarity to developers, communities and the decision maker on requirements. Therefore no amendment is proposed.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0387	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11	Not Specified	No	Not Specified	<p>Whilst supportive of Market Drayton being identified as a Principal Centre and the main focus for growth in this Place Plan Area, consider the draft Shropshire Local Plan is currently unsound as it is not justified or effective. Consider additional housing growth should be directed to the Market Drayton and additional housing allocations are required to ensure delivery of the residential development requirement.</p> <p>Note that the proposed site allocations for Market Drayton are those from the Market Drayton Neighbourhood Plan found to not meet Basic Conditions at Examination (a concern at examination was the lack of formal site assessment and comparison of options). Concerned about these proposed allocations are: -MDR012 is subject to environmental issues (ecology and setting of the Grade II listed Victoria Bridge) which could affect capacity and the Sustainability Appraisal (SA) gives negative scores for key environmental constraints including ground source protection zone, heritage assets and landscape value, which may not be as readily mitigated as factors such as accessibility. The requirement for cross-subsidy of the proposed marina has been removed from the proposed site guidelines for MDR012, but is still referenced and has informed the site assessment - no genuine re-assessment of options. It is therefore not clear on what basis this site has been preferred for allocation versus other site options within Market Drayton. Therefore object to the allocation of MDR012. -1/3 of MDR034 is located in flood zones 2/3 and proposed guidelines exclude development from this element of the site, therefore query proposed capacity of the site (particularly given the SA identifies the need for further flood modelling and the presence of surface water flood risk; heritage issues (Grade II Listed Victoria Bridge and the canal); and surrounding noise (boat yard, commercial development and A53). The requirement for cross-subsidy of the proposed marina has been removed from the proposed site guidelines for MDR034, but is still referenced and has informed the site assessment - no genuine re-assessment of options. It is therefore not clear on what basis this site has been preferred for allocation versus other site options within Market Drayton. Therefore object to the allocation of MDR034. -The draft Shropshire Local Plan recognises the continued uncertainty regarding delivery of MDR039 and MDR043 in relation to the relocation of the Market Drayton Sports Facility and subsequent access arrangements, viability is therefore a key concern. Draft Policy S11 includes contingency proposals regarding other sites along the A53 that could support the sports facility relocation rather than genuinely re-assessing options. Where a site is preferred due to potential to cross-subsidise other development, viability should be clear. MDR039 and MDR043 score poor in the SA yet are proposed for allocation due to ability to deliver a community benefit, without being supported by evidence that this is deliverable, therefore object to the allocation of MDR039 and MDR043.</p> <p>Consider that the draft Shropshire Local Plan should fully consider alternative sites along the A53 to ensure the strategy for Market Drayton is achievable, particularly in light of potential delivery issues associated with MDR039 and MRD043. Such a site is promoted in this representation, consisting of MDR049 plus additional land (plan appended to representation) which represents a reasonable alternative allocation. This site has the potential to provide both necessary housing including affordable housing (capacity for around 550 dwellings having considered constraints) and other community benefits like relocated/additional sports facilities in a more sustainable location closer to the town centre and other potential new development (including site allocation MDR006). It also has the potential for landscape-led and sensitive development that respects its context, including the surrounding countryside. Whilst MDR049 performs poorly in the SA this is primarily due to accessibility and mitigation measures are to be put in place. Promoted site should be allocated instead of those proposed in the draft Shropshire Local Plan, to secure future housing delivery and potential speculative development outside the development boundary (draft Policy SP11 includes a contingency due to delivery uncertainties).</p> <p>Query SA scoring of sites with a negative for lack of access to a service when a site similarly score negative for proximity to a significant environment or physical constraint as some accessibility factors are less restrictive/more readily mitigated. Therefore SA criteria should assign neutral ratings to sites without access to services.</p> <p>Recognise the SA scoring does not consider mitigation, but it could be done in a way that reflects the potential for on-site mitigation in accordance with proposed policies (e.g. larger sites such as MDR049 not in proximity to existing facilities are more likely to provide on-site facilities such as play areas and amenity spaces). This could be done through 'neutral' instead of 'negative' scores on accessibility criteria. S11.2 identifies Community Hub settlements and their guidelines. More of this development should be focused in Market Drayton to a more sustainable and secure strategy (alongside sustainable growth of the Community Hubs and Clusters, as per our comments on draft Policy SP2). Risk of delivery of small sites (non-implementation is higher) should also be recognised.</p>
A0387	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S19 and S20	Not Specified	No	Not Specified	<p>Consider draft Policies S19 and S20 are unsound as they are not fully justified or effective.</p> <p>There does not appear to be any evidence/information with the explanation to the draft Policy demonstrating how the trajectory has been derived and no updates on assessment work have been provided sites the Regulation 19 Consultation on Strategic Sites in 2019.</p> <p>Information on a sites' suitability, availability and achievability can be used to assess likely timescales as well as indicative lead-in times and build out rates, with advice of developers and local agents being important in this regard. The Council should set-out a clear delivery trajectory, be transparent on assumptions applied (which should reflect site specific considerations e.g. existing use, brownfield status and infrastructure requirements) to ensure risks to delivery are fully considered.</p> <p>If the risk assessment demonstrates such sites are likely to be delivered longer term/further beyond the plan period than anticipated, there is a need to identify further flexibility within the housing land supply by directing additional allocations to the urban locations as per the urban focused spatial strategy for development (draft Policy SP2).</p> <p>Have significant concerns about whether proposed development at Clive Barracks is sustainable, given it is too small to have any degree of self-sufficiency and its distance from Market Drayton may encourage dependency on the car (measures to deliver bus services will require subsidies early and throughout development - this needs to be considered alongside other viability factors to ensure the site is viable and deliverable). Consider growth should be directed to Market Drayton in the first instance, as this can deliver growth that is not as reliant on journeys by car. Clive Barracks itself may be better suited to a strategic employment allocation given its location adjacent to the A41, which the plan recognises is an important strategic corridor thereby providing greater alignment with Policy SP12.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0387	B010	<p>Direct additional housing growth to the Principal Centre of Market Drayton and identify additional allocations to ensure delivery of the residential development requirement. Site allocations should be reassessed alongside alternatives to ensure all options for growth have been assessed objectively, without any weight given to the marina or relocated sports pitch, unless there is evidence to support their deliverability.</p> <p>The Sustainability Appraisal (SA) should give consideration to the relative scoring of accessibility factors versus significant physical and environmental constraints. Promoted site (MDR049 plus additional land) should be considered as a reasonable alternative site allocation to secure delivery of the housing requirement for Market Drayton and key objectives for the area, which could include the relocated sports facility given the size of the site.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the proposed development strategy for Market Drayton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Site allocations have been identified through a proportionate and robust Sustainability Appraisal and site assessment process.</p> <p>With regard to MDR039 and MRD043, this site is considered a deliverable sustainable option for residential development. The delivery of this site is not dependent on the relocation of the Market Drayton Sports Association Facilities. However, as recognised within the summary of the site assessment process and the proposed site guidelines for this site, the development proposal does provide a unique opportunity to support the proposed relocation of the Market Drayton Sports Association Facilities to the proposed broad location at Longford Turning, which is a central objective of the Strategy for Market Drayton, through enabling improvements to the pedestrian, cycle and vehicle accessibility into the proposed relocation site. This will include construction of a public footway and cycleway along the northern edge of the site and improved traffic management, sufficient to enable access to both the residential allocation and the proposed future sports facilities on land to the north.</p> <p>With regard to MDR012 and MDR034 it is recognised that the proposed site guidelines for these allocations do not include a requirement to financially cross-subsidise a proposed marina on land at Victoria Farm. The draft Plan does not specifically seek to allocate land for a Marina following consultation comments at the Regulation 18 stage from the Canal &amp; River Trust, and instead policies S11.1, DP10 and SP7 provide a sufficient policy framework should such a proposal come forward during the plan period. CIL contributions from this and other development sites can of course contribute towards the a delivery of a marina. However, importantly, these sites will support improved pedestrian and cycle links the delivery of the proposed marina development and as such indirectly cross-subsidise its delivery, through enhancements to connectivity between the proposed marina site and the town - this is recognised within the proposed site guidelines for these proposed allocations which include "pedestrian and cycle links will be enhanced or provided through the site and linking into the town and to the proposed marina in order to improve the site's overall sustainability". The site assessment undertaken to inform proposed allocations in Market Drayton was based on this opportunity rather than a financial contribution.</p>	No
A0387	B011	<p>Provide further detail to support the housing trajectory identified for Clive Barracks, Tern Hill and the Former Ironbridge Power Station, taking into account the site specific risks and constraints to delivery.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach (including in relation to achieving a step change in productivity) are appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Clive Barracks, Tern Hill and the Former Ironbridge Power Stations are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.</p> <p>The draft Shropshire Local Plan presents information on trajectories for the development of these proposed allocations, informed by discussions with and submissions from the relevant site promoters.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0387	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	MDR012	Not Specified	No	Not Specified	<p>Whilst supportive of Market Drayton being identified as a Principal Centre and the main focus for growth in this Place Plan Area, consider the draft Shropshire Local Plan is currently unsound as it is not justified or effective. Consider additional housing growth should be directed to the Market Drayton and additional housing allocations are required to ensure delivery of the residential development requirement.</p> <p>Note that the proposed site allocations for Market Drayton are those from the Market Drayton Neighbourhood Plan found to not meet Basic Conditions at Examination (a concern at examination was the lack of formal site assessment and comparison of options). Concerned about these proposed allocations are: -MDR012 is subject to environmental issues (ecology and setting of the Grade II listed Victoria Bridge) which could affect capacity and the Sustainability Appraisal (SA) gives negative scores for key environmental constraints including ground source protection zone, heritage assets and landscape value, which may not be as readily mitigated as factors such as accessibility. The requirement for cross-subsidy of the proposed marina has been removed from the proposed site guidelines for MDR012, but is still referenced and has informed the site assessment - no genuine re-assessment of options. It is therefore not clear on what basis this site has been preferred for allocation versus other site options within Market Drayton. 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MDR039 and MDR043 score poor in the SA yet are proposed for allocation due to ability to deliver a community benefit, without being supported by evidence that this is deliverable, therefore object to the allocation of MDR039 and MDR043.</p> <p>Consider that the draft Shropshire Local Plan should fully consider alternative sites along the A53 to ensure the strategy for Market Drayton is achievable, particularly in light of potential delivery issues associated with MDR039 and MRD043. Such a site is promoted in this representation, consisting of MDR049 plus additional land (plan appended to representation) which represents a reasonable alternative allocation. This site has the potential to provide both necessary housing including affordable housing (capacity for around 550 dwellings having considered constraints) and other community benefits like relocated/additional sports facilities in a more sustainable location closer to the town centre and other potential new development (including site allocation MDR006). It also has the potential for landscape-led and sensitive development that respects its context, including the surrounding countryside. Whilst MDR049 performs poorly in the SA this is primarily due to accessibility and mitigation measures are to be put in place. Promoted site should be allocated instead of those proposed in the draft Shropshire Local Plan, to secure future housing delivery and potential speculative development outside the development boundary (draft Policy SP11 includes a contingency due to delivery uncertainties).</p> <p>Query SA scoring of sites with a negative for lack of access to a service when a site similarly score negative for proximity to a significant environment or physical constraint as some accessibility factors are less restrictive/more readily mitigated. Therefore SA criteria should assign neutral ratings to sites without access to services.</p> <p>Recognise the SA scoring does not consider mitigation, but it could be done in a way that reflects the potential for on-site mitigation in accordance with proposed policies (e.g. larger sites such as MDR049 not in proximity to existing facilities are more likely to provide on-site facilities such as play areas and amenity spaces). This could be done through 'neutral' instead of 'negative' scores on accessibility criteria. S11.2 identifies Community Hub settlements and their guidelines. More of this development should be focused in Market Drayton to a more sustainable and secure strategy (alongside sustainable growth of the Community Hubs and Clusters, as per our comments on draft Policy SP2). Risk of delivery of small sites (non-implementation is higher) should also be recognised.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0387	B012	<p>Direct additional housing growth to the Principal Centre of Market Drayton and identify additional allocations to ensure delivery of the residential development requirement. Site allocations should be reassessed alongside alternatives to ensure all options for growth have been assessed objectively, without any weight given to the marina or relocated sports pitch, unless there is evidence to support their deliverability.</p> <p>The Sustainability Appraisal (SA) should give consideration to the relative scoring of accessibility factors versus significant physical and environmental constraints. Promoted site (MDR049 plus additional land) should be considered as a reasonable alternative site allocation to secure delivery of the housing requirement for Market Drayton and key objectives for the area, which could include the relocated sports facility given the size of the site.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the proposed development strategy for Market Drayton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Site allocations have been identified through a proportionate and robust Sustainability Appraisal and site assessment process.</p> <p>With regard to MDR039 and MRD043, this site is considered a deliverable sustainable option for residential development. The delivery of this site is not dependent on the relocation of the Market Drayton Sports Association Facilities. However, as recognised within the summary of the site assessment process and the proposed site guidelines for this site, the development proposal does provide a unique opportunity to support the proposed relocation of the Market Drayton Sports Association Facilities to the proposed broad location at Longford Turning, which is a central objective of the Strategy for Market Drayton, through enabling improvements to the pedestrian, cycle and vehicle accessibility into the proposed relocation site. This will include construction of a public footway and cycleway along the northern edge of the site and improved traffic management, sufficient to enable access to both the residential allocation and the proposed future sports facilities on land to the north.</p> <p>With regard to MDR012 and MDR034 it is recognised that the proposed site guidelines for these allocations do not include a requirement to financially cross-subsidise a proposed marina on land at Victoria Farm. The draft Plan does not specifically seek to allocate land for a Marina following consultation comments at the Regulation 18 stage from the Canal &amp; River Trust, and instead policies S11.1, DP10 and SP7 provide a sufficient policy framework should such a proposal come forward during the plan period. CIL contributions from this and other development sites can of course contribute towards the a delivery of a marina. However, importantly, these sites will support improved pedestrian and cycle links the delivery of the proposed marina development and as such indirectly cross-subsidise its delivery, through enhancements to connectivity between the proposed marina site and the town - this is recognised within the proposed site guidelines for these proposed allocations which include "pedestrian and cycle links will be enhanced or provided through the site and linking into the town and to the proposed marina in order to improve the site's overall sustainability". The site assessment undertaken to inform proposed allocations in Market Drayton was based on this opportunity rather than a financial contribution.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0387	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	MDR034	Not Specified	No	Not Specified	<p>Whilst supportive of Market Drayton being identified as a Principal Centre and the main focus for growth in this Place Plan Area, consider the draft Shropshire Local Plan is currently unsound as it is not justified or effective. Consider additional housing growth should be directed to the Market Drayton and additional housing allocations are required to ensure delivery of the residential development requirement.</p> <p>Note that the proposed site allocations for Market Drayton are those from the Market Drayton Neighbourhood Plan found to not meet Basic Conditions at Examination (a concern at examination was the lack of formal site assessment and comparison of options). Concerned about these proposed allocations are: -MDR012 is subject to environmental issues (ecology and setting of the Grade II listed Victoria Bridge) which could affect capacity and the Sustainability Appraisal (SA) gives negative scores for key environmental constraints including ground source protection zone, heritage assets and landscape value, which may not be as readily mitigated as factors such as accessibility. The requirement for cross-subsidy of the proposed marina has been removed from the proposed site guidelines for MDR012, but is still referenced and has informed the site assessment - no genuine re-assessment of options. It is therefore not clear on what basis this site has been preferred for allocation versus other site options within Market Drayton. 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MDR039 and MDR043 score poor in the SA yet are proposed for allocation due to ability to deliver a community benefit, without being supported by evidence that this is deliverable, therefore object to the allocation of MDR039 and MDR043.</p> <p>Consider that the draft Shropshire Local Plan should fully consider alternative sites along the A53 to ensure the strategy for Market Drayton is achievable, particularly in light of potential delivery issues associated with MDR039 and MRD043. Such a site is promoted in this representation, consisting of MDR049 plus additional land (plan appended to representation) which represents a reasonable alternative allocation. This site has the potential to provide both necessary housing including affordable housing (capacity for around 550 dwellings having considered constraints) and other community benefits like relocated/additional sports facilities in a more sustainable location closer to the town centre and other potential new development (including site allocation MDR006). It also has the potential for landscape-led and sensitive development that respects its context, including the surrounding countryside. Whilst MDR049 performs poorly in the SA this is primarily due to accessibility and mitigation measures are to be put in place. 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This could be done through 'neutral' instead of 'negative' scores on accessibility criteria. S11.2 identifies Community Hub settlements and their guidelines. More of this development should be focused in Market Drayton to a more sustainable and secure strategy (alongside sustainable growth of the Community Hubs and Clusters, as per our comments on draft Policy SP2). Risk of delivery of small sites (non-implementation is higher) should also be recognised.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0387	B013	<p>Direct additional housing growth to the Principal Centre of Market Drayton and identify additional allocations to ensure delivery of the residential development requirement. Site allocations should be reassessed alongside alternatives to ensure all options for growth have been assessed objectively, without any weight given to the marina or relocated sports pitch, unless there is evidence to support their deliverability.</p> <p>The Sustainability Appraisal (SA) should give consideration to the relative scoring of accessibility factors versus significant physical and environmental constraints. Promoted site (MDR049 plus additional land) should be considered as a reasonable alternative site allocation to secure delivery of the housing requirement for Market Drayton and key objectives for the area, which could include the relocated sports facility given the size of the site.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the proposed development strategy for Market Drayton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Site allocations have been identified through a proportionate and robust Sustainability Appraisal and site assessment process.</p> <p>With regard to MDR039 and MRD043, this site is considered a deliverable sustainable option for residential development. The delivery of this site is not dependent on the relocation of the Market Drayton Sports Association Facilities. However, as recognised within the summary of the site assessment process and the proposed site guidelines for this site, the development proposal does provide a unique opportunity to support the proposed relocation of the Market Drayton Sports Association Facilities to the proposed broad location at Longford Turning, which is a central objective of the Strategy for Market Drayton, through enabling improvements to the pedestrian, cycle and vehicle accessibility into the proposed relocation site. This will include construction of a public footway and cycleway along the northern edge of the site and improved traffic management, sufficient to enable access to both the residential allocation and the proposed future sports facilities on land to the north.</p> <p>With regard to MDR012 and MDR034 it is recognised that the proposed site guidelines for these allocations do not include a requirement to financially cross-subsidise a proposed marina on land at Victoria Farm. The draft Plan does not specifically seek to allocate land for a Marina following consultation comments at the Regulation 18 stage from the Canal &amp; River Trust, and instead policies S11.1, DP10 and SP7 provide a sufficient policy framework should such a proposal come forward during the plan period. CIL contributions from this and other development sites can of course contribute towards the a delivery of a marina. However, importantly, these sites will support improved pedestrian and cycle links the delivery of the proposed marina development and as such indirectly cross-subsidise its delivery, through enhancements to connectivity between the proposed marina site and the town - this is recognised within the proposed site guidelines for these proposed allocations which include "pedestrian and cycle links will be enhanced or provided through the site and linking into the town and to the proposed marina in order to improve the site's overall sustainability". The site assessment undertaken to inform proposed allocations in Market Drayton was based on this opportunity rather than a financial contribution.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0387	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	MDR039 & MDR043	Not Specified	No	Not Specified	<p>Whilst supportive of Market Drayton being identified as a Principal Centre and the main focus for growth in this Place Plan Area, consider the draft Shropshire Local Plan is currently unsound as it is not justified or effective. Consider additional housing growth should be directed to the Market Drayton and additional housing allocations are required to ensure delivery of the residential development requirement.</p> <p>Note that the proposed site allocations for Market Drayton are those from the Market Drayton Neighbourhood Plan found to not meet Basic Conditions at Examination (a concern at examination was the lack of formal site assessment and comparison of options). 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MDR039 and MDR043 score poor in the SA yet are proposed for allocation due to ability to deliver a community benefit, without being supported by evidence that this is deliverable, therefore object to the allocation of MDR039 and MDR043.</p> <p>Consider that the draft Shropshire Local Plan should fully consider alternative sites along the A53 to ensure the strategy for Market Drayton is achievable, particularly in light of potential delivery issues associated with MDR039 and MRD043. Such a site is promoted in this representation, consisting of MDR049 plus additional land (plan appended to representation) which represents a reasonable alternative allocation. 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A0388	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP5(1.c.iii)	Not Specified	No	Not Specified	<p>Inconsistency, possibly a typo, in wording in DP5 compared to DP4 &amp; DP6. DP5 ciii states 'Another settlement with a school or appropriate access to a school by sustainable modes of transport' whereas DP4 &amp; DP6 state, 'Another settlement with a school or the ability to access a school by public transport' Support change to public transport as this enables families without access to private cars to live in affordable houses.</p>
A0388	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1(1)	Not Specified	No	Not Specified	<p>The Shropshire Test fails to ensure that where plans are adopted for certain areas, the impacts on other local communities are reviewed and where necessary, addressed. For example, the Shrewsbury Big Town Plan seeks to remove a considerable amount of bus traffic from the town centre by closing the bus station and requiring buses to terminate at the existing park and ride locations. This makes use of public transport to access Shrewsbury Town Centre more difficult as two buses will be required from Baschurch. To access the hospital, 4 buses will be required. This will make the use of buses less attractive, further reducing their sustainability and leading to further services being cut. Whilst the aim of reducing pollution and congestion in the centre of Shrewsbury is to be applauded, policies must not be Shrewsbury centric and must provide a wider solution that supports the whole of the Shropshire community.</p>
A0388	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10(4a)	Not Specified	No	Not Specified	<p>Issues raised and detailed at Regulation 18 stage for SP9 (now SP10) and the associated DP3, DP4, DP5, DP6 and DP7 have not been addressed. There remain concerns that developers could bring forward exception sites that would be unsustainable for those requiring affordable housing. Where a settlement included a school or had access to a school via sustainable transport modes (a very subjective criteria), these could be targeted for multiple sites that could adversely change their character and not be supported by local services. Concerns raised at Reg 18 for SP9 (now SP10) DP3, DP4, DP5, DP6 and DP7 need to be addressed to ensure a good mix of housing in an area, sustainable and viable access to schools, services and employment for those without cars, change in character from multiple and adjacent sites and erosion of gaps between settlements.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0387	B014	<p>Direct additional housing growth to the Principal Centre of Market Drayton and identify additional allocations to ensure delivery of the residential development requirement. Site allocations should be reassessed alongside alternatives to ensure all options for growth have been assessed objectively, without any weight given to the marina or relocated sports pitch, unless there is evidence to support their deliverability.</p> <p>The Sustainability Appraisal (SA) should give consideration to the relative scoring of accessibility factors versus significant physical and environmental constraints. Promoted site (MDR049 plus additional land) should be considered as a reasonable alternative site allocation to secure delivery of the housing requirement for Market Drayton and key objectives for the area, which could include the relocated sports facility given the size of the site.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the proposed development strategy for Market Drayton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Site allocations have been identified through a proportionate and robust Sustainability Appraisal and site assessment process.</p> <p>With regard to MDR039 and MRD043, this site is considered a deliverable sustainable option for residential development. The delivery of this site is not dependent on the relocation of the Market Drayton Sports Association Facilities. However, as recognised within the summary of the site assessment process and the proposed site guidelines for this site, the development proposal does provide a unique opportunity to support the proposed relocation of the Market Drayton Sports Association Facilities to the proposed broad location at Longford Turning, which is a central objective of the Strategy for Market Drayton, through enabling improvements to the pedestrian, cycle and vehicle accessibility into the proposed relocation site. This will include construction of a public footway and cycleway along the northern edge of the site and improved traffic management, sufficient to enable access to both the residential allocation and the proposed future sports facilities on land to the north.</p> <p>With regard to MDR012 and MDR034 it is recognised that the proposed site guidelines for these allocations do not include a requirement to financially cross-subsidise a proposed marina on land at Victoria Farm. The draft Plan does not specifically seek to allocate land for a Marina following consultation comments at the Regulation 18 stage from the Canal &amp; River Trust, and instead policies S11.1, DP10 and SP7 provide a sufficient policy framework should such a proposal come forward during the plan period. CIL contributions from this and other development sites can of course contribute towards the a delivery of a marina. However, importantly, these sites will support improved pedestrian and cycle links the delivery of the proposed marina development and as such indirectly cross-subsidise its delivery, through enhancements to connectivity between the proposed marina site and the town - this is recognised within the proposed site guidelines for these proposed allocations which include "pedestrian and cycle links will be enhanced or provided through the site and linking into the town and to the proposed marina in order to improve the site's overall sustainability". The site assessment undertaken to inform proposed allocations in Market Drayton was based on this opportunity rather than a financial contribution.</p>	No
A0388	B001	Change DP5 wording to match that in DP4 & DP6 'Another settlement with a school or the ability to access a school by public transport'	Noted. The wording is considered appropriate as sustainable modes of transport includes public transport and other sustainable options such as cycling. Policies DP4, DP5, DP6 & DP7 all reference the need for development to be 'served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport'	No
A0388	B002	Add the following sub-paragraph to Paragraph 1: 'h. Ensures all communities are not adversely affected by changes in primary infrastructure, services, facilities or transport '	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. This includes that development will provides sufficient infrastructure, services, facilities, and where necessary provides opportunities for their enhancement.	No
A0388	B003	none specified.	Noted. Response references the provision for exception schemes in SP10 which facilitates affordable development but does not however set out the detailed approach referenced. Issues raised are therefore more appropriately considered in relation to the wording and operation of exception policies DP3, DP4, DP5, DP6 & DP7.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0388	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10(4a)	Not Specified	No	Not Specified	Issues raised and detailed at Regulation 18 stage for SP9 (now SP10) and the associated DP3, DP4, DP5, DP6 and DP7 have not been addressed. There remain concerns that developers could bring forward exception sites that would be unsustainable for those requiring affordable housing. Where a settlement included a school or had access to a school via sustainable transport modes (a very subjective criteria), these could be targeted for multiple sites that could adversely change their character and not be supported by local services. Concerns raised at Reg 18 for SP9 (now SP10) DP3, DP4, DP5, DP6 and DP7 need to be addressed to ensure a good mix of housing in an area, sustainable and viable access to schools, services and employment for those without cars, change in character from multiple and adjacent sites and erosion of gaps between settlements.
A0388	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10(4a)	Not Specified	No	Not Specified	Issues raised and detailed at Regulation 18 stage for SP9 (now SP10) and the associated DP3, DP4, DP5, DP6 and DP7 have not been addressed. There remain concerns that developers could bring forward exception sites that would be unsustainable for those requiring affordable housing. Where a settlement included a school or had access to a school via sustainable transport modes (a very subjective criteria), these could be targeted for multiple sites that could adversely change their character and not be supported by local services. Concerns raised at Reg 18 for SP9 (now SP10) DP3, DP4, DP5, DP6 and DP7 need to be addressed to ensure a good mix of housing in an area, sustainable and viable access to schools, services and employment for those without cars, change in character from multiple and adjacent sites and erosion of gaps between settlements.
A0388	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10(4a)	Not Specified	No	Not Specified	Issues raised and detailed at Regulation 18 stage for SP9 (now SP10) and the associated DP3, DP4, DP5, DP6 and DP7 have not been addressed. There remain concerns that developers could bring forward exception sites that would be unsustainable for those requiring affordable housing. Where a settlement included a school or had access to a school via sustainable transport modes (a very subjective criteria), these could be targeted for multiple sites that could adversely change their character and not be supported by local services. Concerns raised at Reg 18 for SP9 (now SP10) DP3, DP4, DP5, DP6 and DP7 need to be addressed to ensure a good mix of housing in an area, sustainable and viable access to schools, services and employment for those without cars, change in character from multiple and adjacent sites and erosion of gaps between settlements.
A0388	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10(4a)	Not Specified	No	Not Specified	Issues raised and detailed at Regulation 18 stage for SP9 (now SP10) and the associated DP3, DP4, DP5, DP6 and DP7 have not been addressed. There remain concerns that developers could bring forward exception sites that would be unsustainable for those requiring affordable housing. Where a settlement included a school or had access to a school via sustainable transport modes (a very subjective criteria), these could be targeted for multiple sites that could adversely change their character and not be supported by local services. Concerns raised at Reg 18 for SP9 (now SP10) DP3, DP4, DP5, DP6 and DP7 need to be addressed to ensure a good mix of housing in an area, sustainable and viable access to schools, services and employment for those without cars, change in character from multiple and adjacent sites and erosion of gaps between settlements.
A0388	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10(4a)	Not Specified	No	Not Specified	Issues raised and detailed at Regulation 18 stage for SP9 (now SP10) and the associated DP3, DP4, DP5, DP6 and DP7 have not been addressed. There remain concerns that developers could bring forward exception sites that would be unsustainable for those requiring affordable housing. Where a settlement included a school or had access to a school via sustainable transport modes (a very subjective criteria), these could be targeted for multiple sites that could adversely change their character and not be supported by local services. Concerns raised at Reg 18 for SP9 (now SP10) DP3, DP4, DP5, DP6 and DP7 need to be addressed to ensure a good mix of housing in an area, sustainable and viable access to schools, services and employment for those without cars, change in character from multiple and adjacent sites and erosion of gaps between settlements.
A0389	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	MUW012VAR S13.1.1&4 SP12	No	No	No	The draft Local Plan ignores 'localism' legislation and policies & does not comply the Much Wenlock Neighbourhood Plan. Local authority has failed in its legal duties in respect of flooding, a major issue in Much Wenlock, despite extensive representations from affected local residents. The suggestion that employment can be generated in Much Wenlock is unsound, as evidenced by the failure, over many years, of take-up of land made available

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0388	B004	<ul style="list-style-type: none"> <li>Change the paragraphs that state “reasonable access to local services by walking, cycling or public transport” to “reasonable access to local services, schools and employment by walking, cycling or public transport that can be shown to be safe and viable” in DP3, DP4, DP5 and DP7.</li> <li>In DP3, remove the word “appropriately” which is subjective from Para 1.h so that it reads “Ensuring that affordable housing is distributed within the site....”</li> </ul>	Noted. It is considered that the proposed wording of the policy is effective. The requirements of draft Policies DP3-DP7 balance the need to ensure affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing. Draft Policies DP4 -DP7 include a requirement to demonstrate a proven local affordable housing need and include cross-reference to a range of other relevant policies of the Plan which set out other development considerations. These include SP5 ( High Quality Design) , and, where relevant, SP10 which expects that development proposals in the countryside ‘ do not lead to an adverse cumulative impact on the character of communities’ and para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity. An updated Type and Affordability of Housing Supplementary Planning Document will provide an opportunity to provide definition and further context on detailed considerations.	No
A0388	B005	<ul style="list-style-type: none"> <li>Change the paragraphs that state “reasonable access to local services by walking, cycling or public transport” to “reasonable access to local services, schools and employment by walking, cycling or public transport that can be shown to be safe and viable” in DP3, DP4, DP5 and DP7.</li> <li>In DP4, DP5 and DP7, change 1.a.iii from “Another settlement with a school or the ability to access a school by public transport” to “Another settlement with access to both primary and secondary schooling by safe and viable means for those without their own transport.</li> </ul>	Noted. It is considered that the proposed wording of the policy is effective. The requirements of draft Policies DP3-DP7 balance the need to ensure affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing. Draft Policies DP4 -DP7 include a requirement to demonstrate a proven local affordable housing need and include cross-reference to a range of other relevant policies of the Plan which set out other development considerations. These include SP5 ( High Quality Design) , and, where relevant, SP10 which expects that development proposals in the countryside ‘ do not lead to an adverse cumulative impact on the character of communities’ and para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity. An updated Type and Affordability of Housing Supplementary Planning Document will provide an opportunity to provide definition and further context on detailed considerations.	No
A0388	B006	<ul style="list-style-type: none"> <li>Change the paragraphs that state “reasonable access to local services by walking, cycling or public transport” to “reasonable access to local services, schools and employment by walking, cycling or public transport that can be shown to be safe and viable” in DP3, DP4, DP5 and DP7.</li> <li>In DP4, DP5 and DP7, change 1.a.iii from “Another settlement with a school or the ability to access a school by public transport” to “Another settlement with access to both primary and secondary schooling by safe and viable means for those without their own transport.”</li> </ul>	Noted. It is considered that the proposed wording of the policy is effective. The requirements of draft Policies DP3-DP7 balance the need to ensure affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing. Draft Policies DP4 -DP7 include a requirement to demonstrate a proven local affordable housing need and include cross-reference to a range of other relevant policies of the Plan which set out other development considerations. These include SP5 ( High Quality Design) , and, where relevant, SP10 which expects that development proposals in the countryside ‘ do not lead to an adverse cumulative impact on the character of communities’ and para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity. An updated Type and Affordability of Housing Supplementary Planning Document will provide an opportunity to provide definition and further context on detailed considerations.	No
A0388	B007	<ul style="list-style-type: none"> <li>Change the paragraphs that state “reasonable access to local services by walking, cycling or public transport” to “reasonable access to local services, schools and employment by walking, cycling or public transport that can be shown to be safe and viable” in DP3, DP4, DP5 and DP7.</li> <li>In DP4, DP5 and DP7, change 1.a.iii from “Another settlement with a school or the ability to access a school by public transport” to “Another settlement with access to both primary and secondary schooling by safe and viable means for those without their own transport.”</li> <li>In DP6, change Para 1.b from” The site is within and well related to the built form of a settlement and has permanent and substantial buildings on at least one side;” to “The site is within and well related to the built form of a settlement, has permanent and substantial buildings on at least one side and cannot be built next to another exception site approved within the plan period, unless it is genuine in-fill or can demonstrate support from the relevant town or parish council;</li> </ul>	Noted. It is considered that the proposed wording of the policy is effective. The requirements of draft Policies DP3-DP7 balance the need to ensure affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing. Draft Policies DP4 -DP7 include a requirement to demonstrate a proven local affordable housing need and include cross-reference to a range of other relevant policies of the Plan which set out other development considerations. These include SP5 ( High Quality Design) , and, where relevant, SP10 which expects that development proposals in the countryside ‘do not lead to an adverse cumulative impact on the character of communities’ and para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity. An updated Type and Affordability of Housing Supplementary Planning Document will provide an opportunity to provide definition and further context on detailed considerations.	No
A0388	B008	<ul style="list-style-type: none"> <li>Change the paragraphs that state “reasonable access to local services by walking, cycling or public transport” to “reasonable access to local services, schools and employment by walking, cycling or public transport that can be shown to be safe and viable” in DP3, DP4, DP5 and DP7.</li> <li>In DP4, DP5 and DP7, change 1.a.iii from “Another settlement with a school or the ability to access a school by public transport” to “Another settlement with access to both primary and secondary schooling by safe and viable means for those without their own transport.”</li> </ul>	Noted. It is considered that the proposed wording of the policy is effective. The requirements of draft Policies DP3-DP7 balance the need to ensure affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing. Draft Policies DP4-DP7 include a requirement to demonstrate a proven local affordable housing need and include cross-reference to a range of other relevant policies of the Plan which set out other development considerations. These include SP5 (High Quality Design), and, where relevant, SP10 which expects that development proposals in the countryside ‘do not lead to an adverse cumulative impact on the character of communities’ and para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity. An updated Type and Affordability of Housing Supplementary Planning Document will provide an opportunity to provide definition and further context on detailed considerations.	No
A0389	B001	New employment opportunities in Much Wenlock need provision of pre-fabricated units. fitted out to a basic level with electricity and sanitation	The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides an appropriate development strategy for the settlement. The Council has considered flood risk through its Strategic Flood Risk Assessments (Stages 1 and 2) and these have informed the proposed site allocations and the Sequential and Exception Tests.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0390	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SHR060	Not Specified	No	Not Specified	Site SHR060 contains wildlife pond, which is a habitat, including for many nesting birds. It is adjoined to the west by high density residential development. Green corridor between pond & development is too narrow and proposals will have a significant negative impact on pond & wildlife. Density of proposed development too high.
A0391	B001	Sustainability Appraisal	SHR173 policy maps 16b-	No	No	Not Specified	SHR173 assessments is incorrect. This site is within 500 m of the Old River Bed SSSI – north eastern part of the site across road – approx. 30 yards. The Old Riverbed SSSI is one of the most important nature conservation areas in Shropshire and the area of river bed just to the west of Ellesmere Road, to the north of SHR173 is of similar character. Draft local plan has failed to properly assess the site's relationship to the SSSI or to other parts of the old riverbed to the north or to correctly record the landscape as being of exceptionally high character. Limited housing which meets local needs may be desirable at this location but SHR173 is far too large and needs to be reconsidered taking better account of the local environment, amenity value, wildlife corridors including protected bat colonies at Hencote to the north, transport capacity and impact on CO2 emissions. Since site development depends on building the NWRR road & full details of the NWRR, including its environmental, traffic and carbon impact, were unavailable during Plan consultation, the pre-submission draft is not legally compliant, as consultees could not assess whether the local plan can meet its climate change obligations.
A0392	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17	Not Specified	No	Not Specified	Clive should not be a Hub as some identified services are no longer available (bowling green is not available to the community and shop permanently closed). The decision to continue to include these two amenities in Clive's Hierarchy of Settlements assessment score, despite being advised of their loss, means methodology has been used unfairly and inconsistently. Without these two amenities, Clive does not meet the criteria for Community Hub designation, and therefore Clive's inclusion as a Community Hub is not based on accurate evidence and is not justified. Combined with the Council's deferral of matters relating to Clive settlement, this means the Plan is not effective, and therefore it is unsound.
A0393	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	Active and sustainable solutions to the town's transport challenges are the only effective ways to reduce congestion, poor air quality and road deaths/injuries & better lives. As described in the RTPI report (Net Zero Transport: the role of spatial planning and place-based solutions, Jan 2021), spatial planning and the transport systems need to be considered together to create pathway to net zero greenhouse gas emissions. Given national & local climate emergency declarations needs to be a central component of this Local Plan. The RTPI, 2021 identifies that the planning system should prioritise urban renewal that enables growth while achieving a substantial reduction in travel demand & indicates that this should focus on maximising the potential for local living ( by ensuring access to a wide range of services & facilities by walking and cycling) with a key role for increased flexible & home working, digital service delivery & community spaces, alongside investment in place. The draft Local Plan fails to ensure that key planning decisions during its life will contribute to the pathway to achieving net zero. The recent Environmental Audit Committee report on Greening the Post COVID Recovery identifies Covid 19 crisis as a symptom of a growing ecological emergency highlights the urgency of tackling climate change as part of economic recovery. Particular issue with respect to the interaction of spatial planning and transport as Shropshire Council has failed to update its Local Transport Plan in time to inform the draft Local Plan. Spatial Vision' in Para 2.31 of the draft plan has admirable objectives but vision will not be delivered. Submission details against each policy how vision will not be achieved.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0390	B001	Safeguard pond in SHR060 by turning it and land to its west into a nature reserve. Widen & extend the green corridor, preferably to top hedge, for public access & education purposes. Pond to be shown on map	Noted. The proposed site guidelines include the requirement for the site promoter/applicant to develop a masterplan for the site, and for this to be agreed by Shropshire Council, before a planning application is considered. Whilst the Masterplan is in preparation it is yet to be finalised and has not been agreed by the Council as a material planning consideration. It is expected that there will be the opportunity for further community engagement to happen as part of the masterplan process and many of the issues raised in this rep can be considered further at that stage.	no
A0391	B001	Page 22 :Amend criteria for SHR173 to reflect that the site is within 500 m of the Old River Bed SSSI and near landscape of high amenity value, a noted wildlife corridor with protected bat colonies ( north of the old river bed at Hencote) as recognised in planning conditions for the Hencote development and by Historic England re the car park adjacent to the Flaxmill Maltings, where extensive efforts have been made to protect bat roosts and protect their route to the Old River Bed. To be compliant and sound, site SHR 173 needs to be of much smaller scale or removed, in order to reflect the proximity of the SSSI, wildlife corridors and amenity value of the land to the north and north.	The landscape and visual sensitivity for housing on this site are medium for housing and medium low respectively, so the Sustainability Appraisal and Site Assessment conclusion is correct. Proposed changes to the scoring in respect of the SSSI would have no material effect so are not considered necessary.	No
A0392	B001	Clive settlement should not be identified as a Community Hub & be removed from both S17.2 and S17.4 (paragraphs 5.245 and 5.247) as the evidence clearly shows the settlement does not meet the definition of a significant rural service centre, as defined by the Hierarchy of Settlements evidence base.	Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive. With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility. With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub. Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlement's characteristics, constraints and opportunities.	No
A0393	B001	No specific modifications identified. Submission details against each policy how vision will not be achieved.	Noted. The draft Spatial Vision recognises the importance of and identifies the need to move positively towards a zero-carbon economy. The draft Spatial Vision would be implemented through the draft Policies proposed within the draft Shropshire Local Plan. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the draft Shropshire Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0393	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	<p>Spatial Vision' in Para 2.31 of the draft plan has admirable objectives but vision will not be delivered by the Plan as set out in SP1.</p> <p>Re Part a) Supports the health, well-being and safety of communities: Selection of higher target for house building than government targets based on a misguided assumption that building houses equals growth and this in turn leads to health and happiness. This does not correlate with majority preference by local people and town &amp; parish councils for lower rates of building. No detail on how building targets will translate into sustainable development objectives, meet vision aspirations or how residential building is part of a pathway to net zero greenhouse gas emissions for the county.</p> <p>Re part b) Supports cohesive communities: An integrated transport network that does not exclude certain groups is a key requirement for community cohesion. Shropshire Council cannot demonstrate that this has been taken into account in draft Local Plan development as the Local Transport Plan is out of date and a new plan will not be in place before Sept 2021.</p> <p>No definition of 'right location' &amp; how will this be assessed and measured? In order to deliver carbon reduction and identify pathway to net zero carbon emissions, definition required and specification of the conditions that must be met to reduce car use and increase the use of walking, cycling and buses</p> <p>Concern in line with issues highlighted in the 2018 report 'Transport for new homes' that the majority of new housing developments in the draft plan located in places with inadequate/limited walking, cycling and public transport connections to surrounding areas forcing car-dependency and adding carbon emissions. Lack of joined-up thinking on how to facilitate and provide the infrastructure to support walking, cycling and public transport for new residents. Absorbing housing demand from adjacent urban areas into a largely rural area is contradictory to net zero transport system aspirations. There is no reference to car-free housing potential or to site selection based on trip estimation data (TRICS) by different modes. Contrary to net zero carbon targets that trip estimation for different locations and configurations of walking, cycling and bus use opportunities have not been factored into locational decisions for new homes. :Whilst draft plan says that it references the climate change strategy, ignoring car trip generation and its impact on increasing transport's carbon emissions fails to adequately address the largest contributor to carbon emissions in the county (transport) mainly because the local transport plan out of date.</p> <p>Re part c) Addresses the causes and mitigates the impacts of climate change; Whilst the NPPF does not make explicit the need for the Local Plan to proactively set out the route to a net zero society, as a result of climate change emergency declarations, it should form a core part of the definition of sustainable development. The plan needs to recognise importance of spatial planning in the transition to a net zero transport system and set out how planned developments will contribute to this. Given Plan time period &amp; carbon reduction targets by 2050, together with consequences of failing to deliver reductions, every part of the Plan should consider whether it is reducing or adding to carbon emissions. If any policy cannot be evidenced to its outcome measured in terms of carbon reduction it must be amended. Where a policy is evidenced as increasing carbon, it should be removed. To illustrate respondent references Thames Gateway Bridge (2007) Inspector's Report which identifies greenhouse gas emissions linked to private cars and states that even a small increase offers no assistance in achieving the reduction committed to by the Government. The inspector concluded that the proposed TGB would not comply with national transport planning policy and result in a negative contribution to the Government's commitment to reducing greenhouse gases &amp; recommended that the Bridge should not go ahead. On this basis it is inappropriate for the Local Plan to have exclusions from the requirement to contribute to the net zero pathway on the grounds of economic viability. Therefore, if a development cannot be economically developed in a way that contributes net zero pathway it should not proceed. Thus, references to such exemptions throughout the Plan should be removed.</p> <p>Re part d) Conserves and enhances the high-quality natural environment and provides opportunities for green and blue networks; In respect of blue networks, the promotion of the Shrewsbury North West Relief Road (NWRR) by Shropshire Council within the Local Plan is inconsistent with Para 3 of DP19 (water resources and water quality) as the proposed road includes a major roundabout across the inner Source Protection Zone (SPZ1) of the Shelton Water Supply. Re part e) Raises design standards and enhances the area's character and historic environment: there should be no exemptions from requirements to comply with measures that contribute to the pathway to net zero greenhouse gas emissions. f) Makes efficient use of land; and g) Provides sufficient infrastructure, services, facilities, and where necessary provides opportunities for their enhancement.</p> <p>The largest council promoted scheme detailed in the plan is the proposed North West Relief Road which is likely increase car use and carbon emissions over the plan period. It is therefore not appropriate for the Local Plan to include the promotion of this scheme.</p>
A0393	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	<p>Whilst the NPPF does not make explicit the need for the Local Plan to proactively set out the route to a net zero society , as a result of climate change emergency declarations, it should form a core part of the definition of sustainable development. The plan needs to recognise importance of spatial planning in the transition to a net zero transport system and set out how planned developments will contribute to this. Given Plan time period &amp; carbon reduction targets by 2050, together with consequences of failing to deliver reductions, every part of the Plan should consider whether it is reducing or adding to carbon emissions.</p> <p>it is inappropriate for the Local Plan to have exclusions from the requirement to contribute to the net zero pathway on the grounds of economic viability. Therefore, if a development cannot be economically developed in a way that contributes net zero pathway it should not proceed. Thus, references to such exemptions throughout the Plan should be removed.</p> <p>We welcome reference to the government's 25 Year Environment Plan in Para 3.161 SP17 but there should be greater reference to this throughout the document, especially in sections SP3, SP4, and SP9 The Nature Recovery Strategy is about much more than just Biodiversity Net Gain and thus, it should be a constant theme throughout the plan.</p> <p>strategic developments are not located on existing rail infrastructure and so this implies additional road building which is not consistent with the need to address the Climate Emergency</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0393	B002	<p>Modify policy to reflect comments. Comment sets out issues &amp; weaknesses in draft Plan's approach and highlights concerns to be addressed.</p> <p>The following specific modifications identified:-</p> <ul style="list-style-type: none"> <li>-definition required of 'right location' &amp; how will this be assessed and measured and specification of the conditions that must be met to reduce car use and increase the use of walking, cycling and buses.</li> <li>-part (e) remove exemptions from requirements to comply with measures that contribute to the pathway to net zero greenhouse gas emissions.</li> </ul>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. Draft Policy SP1 is a 'gateway' that supplements the proposed vision and sets the context for the wider development framework within the draft Shropshire Local Plan. It is considered appropriate for all proposals to have consideration to the strategic issues identified within draft Policy SP1 as a starting point. The remaining proposed strategic and development management policies of the draft Shropshire Local Plan then expand on these issues.</p> <p>Draft Policy SP2 specifies that to achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, new development will be focused in the urban areas. This will be complemented by appropriate new development in rural areas, in recognition of the rurality of much of Shropshire.</p>	No
A0393	B003	<p>Any policy which cannot be evidenced to its outcome measured in terms of carbon reduction must be amended. Where a policy is evidenced as increasing carbon, it should be removed.</p> <p>Inappropriate for the Local Plan to have exclusions from the requirement to contribute to the net zero pathway on the grounds of economic viability-references to such exemptions throughout the Plan should be removed.</p> <p>Greater reference to Nature Recovery Strategy throughout the Plan .</p> <p>Include more reference to the 25 Year Environment Plan throughout the Draft Plan, especially in sections SP3, SP4, and SP9.</p> <p>Remove references to NWRR.</p>	<p>The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0393	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	<p>DP28 Includes vague aspirational statements not backed by tangibility &amp; therefore of no value. Question whether proposed demolition of Shrewsbury bus station contributes to widening transport choices.</p> <p>Para 4.249 The Hierarchy of Sustainable Transport is a prioritisation tool setting out important principles that will inform overall public policy. Inappropriate to reference the Hierarchy when Council funding &amp; decisions (20mph and bus station) have ignored hierarchy priorities.</p> <p>Reference to NWRR business case needs to reflect NWRR needs to be substantially re worked compared to the Outline Business Case to take into account falling rather than growing levels of traffic ( as detailed in other comments)</p> <p>Part 3e and para 4.257 The largest council promoted scheme detailed in the plan is the proposed North West Relief Road Based on information available at this time it is calculated that it will result in higher levels of car use and increased carbon emissions. It is therefore not appropriate for the Local Plan to include the promotion of this scheme.</p> <p>Para 4.257 Assumptions and justifications for the NWRR are no longer appropriate in light of government policy which will emerge in light of the Climate Emergency and Net Zero CO2 target &amp; result in traffic levels dropping. The business case and justification for the NWRR thus needs reassessment.</p> <p>Adoption of the NWRR in the plan &amp; effectively prioritising development opportunities over carbon emissions reduction is contrary to national net zero carbon objectives of net zero by 2050. It is accepted, including in 1994 Government report, that new roads like the NWRR generate additional traffic increasing transport's carbon emissions. Not acceptable that the Plan's reference to NWRR as the largest transport capital expenditure on undertaken by Shropshire Council does not reference &amp; is not explicitly linked to its carbon impacts. The NWRR is not approved. Independent evidence of the carbon impacts of NWRR needed which can be scrutinised &amp; evaluated. If this evidence indicates that the NWRR will reduce carbon, then this must be stated in the Local Plan, allowing evaluation for robustness and fitness for Local Plan purposes. If independent evidence shows that the NWRR will substantially increase carbon emission (both embodied carbon and use carbon) then it must form part of a realistic assessment of the ability of Shropshire Council to contribute to the achievement in net zero carbon.</p> <p>The existing Local Transport Plan, the existing plan - LPT3 which remains the relevant transport plan does not envisage that the NWRR will be needed during the lifetime of that plan. The NWRR is therefore not an essential part of the Local Plan.</p> <p>All DPs do not &amp; should contain an explicit link to the ways they will assist in achieving net zero carbon.</p> <p>Reference para 4.248 DP28 strategic developments are not located on existing rail infrastructure indicating additional road building which is inconsistent with the need to address the Climate Emergency</p>
A0393	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	<p>S16.1 7, 10a The largest council promoted scheme detailed in the plan is the proposed North West Relief Road (DP28 3e and 4.257 and S16.1 7, 10a). based on information available at this time our calculations indicate that the scheme will lead to higher levels of car use and an increase in carbon emissions in the county during the plan period. It is therefore not appropriate for the Local Plan to include the promotion of this scheme.</p> <p>S16.1 (7) Reiterate comments about the weak case for the NWRR expressed with reference to DP28. NWRR s should be omitted from the Local Plan unless a revised business case and carbon assessment shows that it still makes economic and environmental sense.</p> <p>The Shrewsbury Place Plan appears to allow commercial development but not residential in the area west of Ellesmere Rd but this is not clear in the document.</p> <p>Part 10a Re the reinforcement and enhancement of the local and strategic highway network: Investment in new roads is not consistent with the Climate Emergency or Net Zero CO2 target. Shrewsbury Integrated Transport Strategy, the Big Town Plan Movement Strategy and the Shropshire Local Transport Plan: None of these documents are available for the consultation and it is not clear how they support or are supported by the NWRR</p> <p>Para 5.225 Allocation of SHR173 assumes NWRR will be built but its traffic won't be included in NWR assessment and should be as the understanding cumulative impacts of developments is essential</p>
A0393	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	<p>In respect of blue networks, referenced in Shropshire Test Policy SP1 we agree with policy DP19 (water resources and water quality) however promotion of the Shrewsbury North West Relief Road (NWRR) by Shropshire Council within the Local Plan is inconsistent with Para 3 of this policy as the proposed road includes a major roundabout across the inner Source Protection Zone (SPZ1) of the Shelton Water Supply.</p> <p>All DPs do not &amp; should contain an explicit link to the ways they will assist in achieving net zero carbon.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0393	B004	<p>See issues summary. Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed;            Specific amendments identified :            Do not include promotion of NWRR in Draft Local Plan;            Omission of content re "widening travel and transport choices" in the Plan needs to be addressed;            Explicitly identify within the policy how it will assist in achieving net zero carbon;</p>	<p>The need to reduce traffic and encourage alternative travel options is a theme running throughout the Plan and given particular emphasis in Policy DP28: Communications and Transport in relation to the Hierarchy of Sustainable Transport. The Local Plan places an emphasis on the location of new development in existing urban centres and the wording of many policies supports pedestrian, cycling and other sustainable transport options. This is supported and informed by the Sustainability Appraisal and site assessment process which contain criteria aimed at minimising car-based travel and encouraging walking and cycling or the use of public transport for longer journeys. Policy DP28 recognises that a sustainable transportation system for Shropshire must include a range of transport networks and services and present a range of travel options to individuals, households, organisations and businesses. Policy DP28 constructs the transportation system into a hierarchy to promote sustainable choices by informing and encouraging those travelling or transporting goods to choose sustainable transport options to meet their needs. Although this hierarchy includes modes of transport considered to be unsustainable, these options are still part of the transportation system and may be the best or only means by which to travel or transport goods over long distances or to access less well-connected places. Policy DP28 also recognises the need for more sustainable choices in looking towards the delivery of new travel and transport options and advocates the Hierarchy of Sustainable Transport as a simple decision pathway for everyone to follow in making their choices about travel and transport and by encouraging everyone to consider how they can contribute to reversing adverse changes to our environment. Shropshire Council has set out in Policy DP28 the summary explanation for the North West Relief Road from the Outline Business Case for the construction of this new road. The primary purpose of the road is to link the urban highway network in both the north and the west of the town together to remove the need for local and through traffic to circumnavigate the east, south and west quadrants of the town or to travel through the town centre s opposed to simply traversing the north-west quadrant of the town. This strategic infrastructure proposal has been included in Policy DP28 to recognise a fundamental principal of the Hierarchy of Sustainable Transport which is the continuing need for private motor transport particularly with the national programme to move to vehicles with electronic power cells and other non-fossil fuel energy sources. This continuing need for private transport brings with it a need for essential improvements or new construction on the highway networks to support its use in order to properly serve the needs of the economy and the communities in Shropshire, the West Midlands and England. Shropshire Council considers that the principles and objectives of the Hierarchy of Sustainable Transport and the NWRR are mutually inclusive and contribute to the strengths and opportunities provided by a broad based, balanced and ambitious Local Plan. The Council considers that these two principles and objectives for the Hierarchy of Sustainable Transport and the provision of the NWRR are consistent with the strategy of the Local Plan. The policy framework is also internally consistent with the inclusion of the NWRR in Policy DP28 when the plan is read as a whole.</p>	No
A0393	B005	<p>See issues summary . Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed .Modify policy to reflect comments;            The following specific modifications identified:            Do not include promotion of NWRR ;            NWWR s should be omitted from the Local Plan unless a revised business case and carbon assessment shows that it still makes economic and environmental sense.            Clarify development proposals west of Ellesmere Rd;            Address inconsistency that investment in new roads to achieve reinforcement and enhancement of the local and strategic highway network incompatible with carbon reduction:</p>	<p>The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.</p>	No
A0393	B006	<p>See issues summary. Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed.            Explicitly identify within the policy how it will assist in achieving net zero carbon</p>	<p>The Council considers that the Policy provides appropriate and adequate protection for groundwater Source Protection Zones. The Council also considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0393	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	<p>Welcome inclusion of a specific Climate Change policy but needs to be much stronger &amp; should be named 'Climate Emergency'. Paras 1a-g in SP3 are at variance with other statements &amp; established policies and track record of Shropshire Council that damage public transport and active travel including: rejection of default 20mph zones (at Council in Dec 2019) despite evidence re the effectiveness in increasing walking and cycling and reducing transport's carbon emissions; reductions in bus funding ; demolition of Shrewsbury bus station contrary to the central principle of sustainable transport which is integration, achieved by close location of train &amp; bus stations to encourage bus and train use in combination and this combination; refusal to develop a Cycling and Walking Infrastructure Plan. Statements in SP3 at variance with Shropshire Council neglect and damage to walking, cycling and public transport and nothing in the Local Plan that demonstrates a reversal of these policies.</p> <p>Re para 1 a Local Plan does not give substance to the aspiration of "maximising the ability to make trips by sustainable modes of transport" which requires interventions e.g. those available under Bus Services Act (2017) ( such as those used by Cornwall County Council's bus strategy) to produce substantial increases in walking, cycling and bus use &amp; and there is nothing in the Local Plan to indicate that this will be done in the plan period. The text makes nothing compulsory but and the words 'encourage' and 'where possible' and 'promoting' are meaningless unless enforceable and enforced.</p> <p>Policy aspirations call into question traffic figures used in the outline business plan for the proposed Shrewsbury North West Relief Road. These need review in the light of the COVID pandemic and the climate emergency.</p> <p>Para 3.31 The Strategy framework is not a strategy but an outline of how the strategy will be developed. The Local Plan needs to reference the council's Climate Change Strategy or more appropriately, as this document only refers to Shropshire Council's emissions, the Zero Carbon Shropshire Plan produced through the Shropshire Climate Action Partnership of which Shropshire Council is a contributor. This addresses the totality of direct and indirect emissions &amp; in the absence of an up to date transport plan could provide some of the headline figures of how transport (and by implication spatial planning) needs to change. The implications of this policy have not been followed through into the traffic forecasts that are used in the outline business case for the NWRR. Support for active travel ( para 1d ) is not linked to adoption of EVs or ULEVs. Driving a car is a sedentary activity &amp; car ownership increases car use and reduces walking, cycling and bus use. If people drive rather than walking or cycling, they do not meet public health targets for physical activity with resulting elevated disease risk. The local plan includes nothing to stimulate or promote non-car alternatives including infrastructure to support walk, cycle and bus use such as: excellent segregated cycle paths, joined-up networks to link housing with schools / commonly used destinations. These requirements are not supported or funded in Shropshire&amp; there has been a refusal by Shropshire Council to adopt 20mph contrary to WHO advice in the Stockholm declaration that this increases active travel and modal shift away from cars and towards walking, cycling and bus use. It highlights that appropriate speed management to address environmental &amp; safety issues is important.</p> <p>Wholesale adoption of Electric vehicles on its own, without significant traffic reduction, is not enough to meet net zero targets &amp; the significance of transport and climate change is a major weakness of the climate change sections of the Local Plan as highlighted in the recent Lyn Sloman report for at Transport for Quality of Life.</p> <p>A completely new section should be included in the Local Plan explaining why we must reduce traffic levels (e.g. a 25% reduction in vehicle kms travelled in Shropshire). This is well understood and be found in UK government reports but is not mentioned in the Local Plan.</p>
A0393	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	High quality design should not compromise sustainability and should incorporate extensive sustainable design features beyond solar.
A0393	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	Para 6 & 7. Welcome the inclusion of Sport's England's '10 principles of active design' as a requirement. However, it is not possible for individual developments to contribute properly to well-designed walking and cycling routes without a high level strategy of where these routes need to be. In this respect, Shropshire Council's refusal to develop a Local Walking and Cycling Infrastructure Plan will largely negate the potential benefits of this policy.
A0393	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	There should be reference to addressing business carbon emissions in the policy .
A0393	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	Renewable energy is mentioned in the opening paras but there is no consideration in the plan of how much is required or how this might be achieved.SP10 5(d) Investment should be prioritised for sustainable transport in appropriate locations, in line with DfT guidance on a hierarchy of road users as road transport is a major contributor to the Climate Emergency.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0393	B007	<p>See issues summary . Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed .Modify policy to reflect comments;</p> <p>The following specific modifications identified:</p> <ol style="list-style-type: none"> <li>1. Welcome specific Climate Policy but needs to be much stronger &amp; be re- named 'Climate emergency'</li> <li>2 Para 1.e. Weak wording, change "encourage" to "ensure". A site should not be on the list unless it can be linked and integrated and unless it is a condition for development.</li> <li>3. Para 1.f. The wording is weak as electric charging infrastructure should be provided in all new development.</li> <li>4 Para 1.g. Fabric energy efficiency should be defined with a minimum figure.</li> <li>5. The local plan needs to do more to achieve traffic reduction and to stimulate or promote non-car alternatives e.g. appropriate infrastructure provision &amp; speed management (20mph speed limit);</li> <li>6. Para 3.31 needs to reference the Council's Climate Change Strategy or more appropriately, the Zero Carbon Shropshire Plan</li> <li>7. A new section should be included in the Local Plan explaining why we must reduce traffic levels (e.g. a 25% reduction in vehicle kms travelled in Shropshire).</li> <li>8. Include greater reference to 25 Year Environment Plan</li> </ol>	<ol style="list-style-type: none"> <li>1. The name of draft Policy SP3 is considered to appropriately reflect its subject matter.</li> <li>2. The proposed change would impose an unreasonable requirement given that the rural nature of Shropshire means that not all new development will be able to link to or integrate with public transport.</li> <li>3. The provision of electric vehicle infrastructure is covered by Building Regulations rather than the planning regime.</li> <li>4. Energy efficiency ratings are covered by Building Regulations and it is not considered necessary to refer to specific figures in this policy</li> <li>5 and 7. The need to reduce traffic and encourage alternative travel options is a theme running throughout the Plan. There is an emphasis on the location of new development in existing urban centres, the wording of many policies supports pedestrian and cycling options and the Sustainability Appraisal and site assessment process contain criteria aimed at minimising car-based travel and encouraging walking and cycling.</li> <li>6. The Council's Climate Change Strategy covers issues which are primarily delivered by mechanisms other than the planning process - although the Local Plan does reflect the Strategy's priorities when they accord with national planning policy and guidance. Accordingly, it is not considered necessary to reference the document in this paragraph.</li> <li>8. The government's 25 year Environment Plan covers a wide range of issues and where its provisions affect the planning process, they have been reflected in Shropshire Local Plan policies. However, the Shropshire Local Plan should be read as a whole and the Council does not consider it necessary to include additional references to the 25 year Environment Plan.</li> </ol>	No
A0393	B008	<p>High quality design should incorporate extensive sustainable design features beyond solar. Strengthen with additional guidance: "should be designed to integrate space for both people and wildlife, reduce carbon emissions and minimise water usage".</p>	<p>Noted. Draft Policy SP5 already states "Design and layout positively responds to our changing climate by taking opportunities to maximise energy efficiency (including maximising opportunities for solar gain), minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan".</p> <p>Furthermore the draft Shropshire Local Plan should be read as a whole and wider draft policies also address these issues. For instance draft Policies SP3 and DP11 address climate change and minimising carbon emissions; draft Policy SP6 addresses health and wellbeing, including consideration of "the provision of appropriate levels of private and public open space"; draft Policy DP15 addresses provision of open space within development; draft Policies DP14 and DP16 address green infrastructure and landscaping of new development respectively; and draft Policy DP20 addresses water efficiency.</p>	No
A0393	B009	<p>Need for high level strategy for walking &amp; cycling routes &amp; Local Walking &amp; Cycling infrastructure Plan</p>	<p>The need to reduce traffic and encourage alternative travel options is a theme running throughout the Plan. There is an emphasis on the location of new development in existing urban centres, the wording of many policies supports pedestrian and cycling options and the Sustainability Appraisal and site assessment process contain criteria aimed at minimising car-based travel and encouraging walking and cycling.</p>	No
A0393	B010	<p>include reference to addressing business carbon emissions</p>	<p>The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed</p>	No
A0393	B011	<p>Needs to set out how much renewable energy is required &amp; how this might be achieved. How many solar or wind farms are likely to be required and where would they be best located within the county;</p> <p>SP10 5(d) Investment should be prioritised for sustainable transport in appropriate locations</p>	<p>Local Plan has to address a wide range of issues and requirements and is intended to be read as a whole. Therefore, in addition to the criteria set out in Draft Policy SP10, the relevant considerations of all other applicable policies will need to be taken into account in decision making on planning applications. Council considers that the approach taken to renewable energy in policy DP26 Strategic Infrastructure, as well to climate change and reducing carbon emissions more generally throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. The Transport Plan sets out transport investment priorities .No change proposed.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0393	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	No SP14 specific comment
A0393	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan.
A0393	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon. DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan.
A0393	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan. There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing Pitch strategy indicates new facilities on new sites are a last resort. Thus, in addition to existing lack of infrastructure for cycling and pedestrians there is also a lack of infrastructure in the design of new facilities including public open spaces for family access.
A0393	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan. There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing Pitch strategy indicates new facilities on new sites are a last resort. Thus, in addition to existing lack of infrastructure for cycling and pedestrians there is also a lack of infrastructure in the design of new facilities including public open spaces for family access.
A0393	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan. There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing Pitch strategy indicates new facilities on new sites are a last resort. Thus, in addition to existing lack of infrastructure for cycling and pedestrians there is also a lack of infrastructure in the design of new facilities including public open spaces for family access.
A0393	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan. There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing Pitch strategy indicates new facilities on new sites are a last resort. Thus, in addition to existing lack of infrastructure for cycling and pedestrians there is also a lack of infrastructure in the design of new facilities including public open spaces for family access.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0393	B012	Para 3.144 and 3.145 Replace "should" with "must" to make this enforceable	The wording of Policy SP14 reflects the provisions in NPPF paragraph 2 that the development plan and its policies are the primary consideration for determining development proposals. Therefore, the wording of Policy SP14 does not alter the effect or enforceability of the policy where it is appropriate to approve or refuse permission for development. The policy does however, provide sufficient flexibility for circumstances where other material circumstances indicate that development may be approved contrary to the policy objectives. The wording of SP14 therefore satisfies the requirements in NPPF in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policy also recognises the need for flexibility due to the presumption in paragraph 10 in favour of sustainable development to allow for circumstances where the benefits of a proposal clearly justify development that otherwise would be considered contrary to policy.	No
A0393	B013	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0393	B014	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0393	B015	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period; modify for greater recognition of the need to supply more accessible natural greenspace for affordable housing developments	Noted. Draft Policy DP3. Affordable Housing Provision includes a policy requirement of "Ensuring that affordable housing is appropriately distributed within the site, their locations maximise opportunities for future residents to access services and facilities by walking, cycling or public transport and minimises the exposure of future residents to sources of noise or reduced air quality." Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B016	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period; modify for greater recognition of the need to supply more accessible natural greenspace for affordable housing developments	Noted. Draft Policy DP3. Affordable Housing Provision includes a policy requirement of "Ensuring that affordable housing is appropriately distributed within the site, their locations maximise opportunities for future residents to access services and facilities by walking, cycling or public transport and minimises the exposure of future residents to sources of noise or reduced air quality." Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B017	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period; modify for greater recognition of the need to supply more accessible natural greenspace for affordable housing developments	Noted. Draft Policy DP3. Affordable Housing Provision includes a policy requirement of "Ensuring that affordable housing is appropriately distributed within the site, their locations maximise opportunities for future residents to access services and facilities by walking, cycling or public transport and minimises the exposure of future residents to sources of noise or reduced air quality." Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.	No
A0393	B018	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period; modify for greater recognition of the need to supply more accessible natural greenspace for affordable housing developments	Noted. Draft Policy DP3. Affordable Housing Provision includes a policy requirement of "Ensuring that affordable housing is appropriately distributed within the site, their locations maximise opportunities for future residents to access services and facilities by walking, cycling or public transport and minimises the exposure of future residents to sources of noise or reduced air quality." Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. N	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0393	B019	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan. There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing Pitch strategy indicates new facilities on new sites are a last resort. Thus, in addition to existing lack of infrastructure for cycling and pedestrians there is also a lack of infrastructure in the design of new facilities including public open spaces for family access.
A0393	B020	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan.
A0393	B021	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan.
A0393	B022	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan. DP10 fails to recognise the importance of shifting tourism car trips as much as possible to public transport and bikes. This is unacceptable. Part f) Although the natural environment as a major tourism draw is recognised, retaining and enhancing natural features is key to the long-term success of the tourism industry. Stronger policy wording required.
A0393	B023	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon. Policy weak & limited to referencing minimising emissions – not road to net zero. Policy does not form basis for a coherent plan for supporting the county's contribution towards the national target of net zero by 2050. Unacceptable that evidence in the Local Plan that transport carbon is responsible for 37% of Shropshire's total carbon, is not used to support policies that explicitly and tangibly reduce car use. Transport carbon reduction is not mentioned in 1a-1d or sections 2, 3 and 4 DP11 (1 C ) We welcome this but we would like to see a commitment to an increased level of on-site renewable energy sources Large commercial/industrial developments must have the same commitment to providing a percentage of their predicted energy needs through on-site renewable and low carbon sources. (cross references comment on 3.134. but no 3.134 in the submission) DP11(4) Disappointing that when reducing carbon emissions and addressing climate change is balanced against profit, profit wins. Given climate emergency this must be the priority.
A0393	B024	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; 10% gain for nature target is not ambitious enough it is the minimum when Government proposals are for at least 10% gain; does not align with the Wildlife Trusts & UN who have identified a need for 30% of land to be protected and in recovery for nature. Given the import of the natural environment in Shropshire's attractiveness as a place to live, do business and visit, protecting the natural environment needs to be at the core of the Local Plan. The Nature Recovery Strategy is about much more than just Biodiversity Net Gain and thus, it should be a constant theme throughout the plan.
A0393	B025	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B026	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; Question the infeasibility of producing a green infrastructure opportunity map. Resources to do so could be achieved via partnership with other organisations. NPPF paragraph 174, suggests that maps are needed for restoration/creation areas.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0393	B019	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period; modify for greater recognition of the need to supply more accessible natural greenspace for affordable housing developments	Noted. Draft Policy DP3. Affordable Housing Provision includes a policy requirement of "Ensuring that affordable housing is appropriately distributed within the site, their locations maximise opportunities for future residents to access services and facilities by walking, cycling or public transport and minimises the exposure of future residents to sources of noise or reduced air quality." Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.	No
A0393	B020	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B021	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B022	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period ;Developers should be required to contribute to the upkeep of natural assets to maintain and enhance the tourism offer; Stronger policy wording required in respect of part f) relating to natural environment; policy needs to recognise importance of shifting tourism car trips as much as possible to public transport and bikes.	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0393	B023	See issues summary. Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed. Specific amendments identified : Explicitly identify within the policy how it will assist in achieving net zero carbon; Modify policy to reflect comments; Include commitment to an increased level of on-site renewable energy sources. Reference information that transport carbon is responsible for 37% of Shropshire's total carbon; Reference transport carbon reduction in 1a-1d & sections 2, 3 and 4 DP11 (2) Include requirement for large commercial/industrial developments to have the same commitment to providing a percentage of their predicted energy needs through on-site renewable and low carbon sources; Policy to prioritise addressing Climate Change over profit	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0393	B024	Explicitly identify within the policy how it will assist in achieving net zero carbon; More ambitious target than 10% for nature gain as per summary of comments; DP12 (4) Add areas within any future Nature Recovery Network to the list to be assessed; DP12 (5) Proposals which are shown to have an adverse effect, directly, indirectly or cumulatively, to those natural assets listed should be refused. Exceptions should only be made in the most exceptional circumstances and there is a for clear methodology on how you compare the value of a natural asset to economic or social benefit.	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0393	B025	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0393	B026	Explicitly identify within the policy how it will assist in achieving net zero carbon; DP14 (4) Green space should be managed and maintained for at least the lifetime of any development; partnership with other organisations to develop a green infrastructure opportunity map should be explored	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0393	B027	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; Quality and quantity are important and need to be considered more equally
A0393	B028	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B029	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B030	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B031	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B032	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B033	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; The construction of the NWRR on an embankment on the floodplain of the River Severn will increase flood risk upstream. Changed construction to columns to reduce this risk (but increase noise and visual intrusion) was covered adequately in the public consultation and will need to be repeated resulting in timescale implications.
A0393	B034	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B035	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B036	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B037	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B038	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B039	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0393	B027	Explicitly identify within the policy how it will assist in achieving net zero carbon; Quality and quantity need to be considered more equally	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0393	B028	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0393	B029	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0393	B030	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0393	B031	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B032	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B033	See issues summary. Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B034	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B035	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B036	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B037	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B038	Explicitly identify within the policy how it will assist in achieving net zero carbon	Shropshire Council welcomes the support for Policy DP27 as evidence of the soundness of the Draft Local Plan. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. This is especially promoted through Policy DP27 and the key objectives of the policy to deliver high quality, digital infrastructure that meets the needs of businesses and communities as an essential utility to support their quality of life, to facilitate social inclusion and reduce the need to travel to access work, services and leisure opportunities particularly to support how they choose to work, live and seek to lower the 'carbon footprint' of their business operation or lifestyle.	No
A0393	B039	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0393	B040	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B041	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B042	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0393	B043	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	Allocation assumes NWRR will be built but its traffic won't be included in NWR assessment and should be as the understanding cumulative impacts of developments is essential. The presence of an adjacent Local Wildlife Site and nearby SSSI are included in Sustainability Appraisal text but not counted in the assessment matrix. Question that the site scores well in terms of the climate change assessment (bus stop within 480 m) despite the issue of the number of car journeys being generated being of such a scale that the development would be dependent on the proposed NWRR to accommodate the additional traffic.
A0393	B044	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	Welcome reference to the government's 25 Year Environment Plan in Para 3.161 SP17 but there should be greater reference to this throughout the document, especially in sections SP3, SP4, and SP9 The Nature Recovery Strategy is about much more than just Biodiversity Net Gain and thus, it should be a constant theme throughout the plan.
A0393	B045	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	Welcome reference to the government's 25 Year Environment Plan in SP17 but there should be greater reference to this throughout the document, especially in sections SP3, SP4, and SP9.
A0393	B046	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	para 2.31	No	No	Not Specified	We welcome reference to the government's 25 Year Environment Plan in SP17 but there should be greater reference to this throughout the document, especially in sections SP3, SP4, and SP9.
A0393	B047	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.31	No	No	Not Specified	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0394	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Schedule S14.2(i) KCK009	Not Specified	Yes	Not Specified	S14.2. Community Hubs: Knockin . Support the proposed allocation of KCK009 for 25 dwellings. Development of site KCK009 would enable the sustainable development of Knockin within the Plan period. Site is adjacent to the existing built edge of Knockin & a logical location for village future expansion. There are limited site-specific constraints, and development would be proportionate to Knockin's role as a Community Hub. No known in principle reasons why detailed policy requirements re access, heritage, trees & drainage & flood risk set out in draft guidelines cannot be met. Site is deliverable – landowner in negotiations with developers and pre-application discussions have taken place with Shropshire Council under the pre-application process. Extract of masterplan scheme submitted at the pre-application stage shows how the site can accommodate 27 dwellings and demonstrates that it could address the detailed KCK009 policy requirements as part of a future planning application. The Estate has experience & a track record of timely delivery of residential sites. Consider forecast delivery timetables for the site at Appendix 7 of the Draft Local Plan are achievable & delivery could comfortably occur before identified medium term subject to the planning process.
A0394	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2(i) LYH007	Not Specified	Yes	Not Specified	Support the proposed allocation of LYH007 for 50 dwellings. Development of site KCK009 would enable the sustainable development of Llanymynech within the Plan period. Site is adjacent to the existing built edge of Llanymynech & a logical location for village future expansion. There are limited site-specific constraints, and development would be proportionate to Llanymynech role as a Community Hub. Support the Regulation 19 Local Plan's policy requirements for LYH007 re access, heritage, rights of way; hedgerows and watercourses; drainage & flood management and the canal as set out in draft guidelines. Site is deliverable as demonstrated by pre-application submission to Shropshire Council which has appropriate evidence submitted. Further evidence would be commissioned at planning application stage. The pre-app scheme for site development is in accordance with the LYH007 draft site guidelines. It proposes 53 new homes of mixed size and tenure, with 10% affordable housing in accordance with emerging policy DP3. The scheme would be accessed through the recently implemented residential development at Barley Meadows, which until its development was also owned by Bradford Estates. This demonstrates that the Estate has ability, experience & a track record of delivery of residential sites. Consider forecast delivery timetables for the site at Appendix 7 of the Draft Local Plan are achievable & delivery could comfortably occur within the identified short-medium term.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0393	B040	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B041	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B042	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B043	See issues summary. Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed. Need for the traffic implications of SHR173 to be included in the NWRR traffic modelling to assess cumulative impacts; Address highlighted inconsistencies in SA	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0393	B044	n/a- see comments	Noted. It is considered that the principles of the Government's 25 Year Environment Plan are appropriately embedded within the draft Shropshire Local Plan. The draft Shropshire Plan should be read as a whole.	No
A0393	B045	Include greater reference to 25 Year Environment Plan	Government's 25 year Environment Plan covers a wide range of issues and where its provisions affect the planning process, they have been appropriately reflected in the draft Policies of the draft Shropshire Local Plan, which should be read as a whole. Shropshire Council does not consider it necessary to include additional references to the 25 year Environment Plan.	No
A0393	B046	Include greater reference to 25 Year Environment Plan	Government's 25 year Environment Plan covers a wide range of issues and where its provisions affect the planning process, they have been reflected in Shropshire Local Plan policies. However, the Shropshire Local Plan should be read as a whole and the Council does not consider it necessary to include additional references to the 25 year Environment Plan.	No
A0393	B047	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0394	B001	n/a	Noted	No
A0394	B002	N/A	Noted	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0395	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21	Not Specified	Not Specified	Not Specified	<p>Support proposed release of the Midland Air Ambulance Charity element of the RAF Cosford site from the Green Belt. The Midland Air Ambulance Charity site was selected as the optimum location for its new airbase with considerable care, having systematically tested all other possibilities. Following a successful Planning Application, work is now underway to construct the airbase with completion and occupation programmed for late summer 2022. This facility will enable the Charity to deliver a world-class, pre-hospital emergency medical service to six million people in the Midlands area. Aware consideration of this Planning Permission balanced consideration of advantages of this service and potential harm to the Green Belt and great effort was placed into building design and landscaping to avoid need for change and minimise further harm to the Green Belt (including a robust 'edge' to the Green Belt on the Northern boundary of the site). Release of the site from the Green Belt is not to facilitate further substantial development but to provide future flexibility in modifying/making modest additions to the facility including such factors as:</p> <ul style="list-style-type: none"> <li>-Provision of gardeners' sheds or small pavilions within the landscaped areas.</li> <li>-Introduction of sculptural public artwork in memorial to patients and other minor built items marking significant donations.</li> <li>-Improvements to the events areas, planting of gardens.</li> <li>-Changes arising from different energy supply solutions such as different methods of helicopter fuel storage or placing additional solar panels on the roof of the building.</li> <li>-Adaptation and development of delivery areas.</li> <li>-Making further ecology / wildlife / tree areas with other Charities or in conjunction with the local community.</li> </ul> <p>Green Belt status would make securing necessary consents substantially more difficult.</p>
A0396	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.</p>
A0396	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '.. will make provision for the needs of the town and surrounding hinterland...'? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?</p>
A0396	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0395	B001	N/A	Noted.	No
A0396	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No
A0396	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0396	B003	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0396	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?
A0396	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not compatible with one another re poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.
A0396	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.
A0396	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 specifies development can only occur where there is sufficient infrastructure capacity available or where the development funds necessary improvements to infrastructure through a suitable developer contribution. What contributions are required of BRD030 and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 recognises businesses and communities require quality broadband provision/mobile network connectivity and also states development proposals will be expected to provide infrastructure for broadband and mobile communications as essential utilities. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0396	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. Shropshire Council has undertaken an Economic Development Needs Assessment and Employment Land Review to inform the Local Plan Review. The Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Specifically with regard to employment land, this proposed strategy provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Having a supply of land which creates choice and competition in the market provides flexibility to respond to changing circumstances.</p> <p>Employment allocations are specifically allocated for employment purposes. Draft Policy SP13 indicates that allocated employment land will be protected for employment generating uses and alternative uses will only be supported in specific circumstances, as documented within the draft Policy.</p>	No
A0396	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0396	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0396	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0396	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published?</p> <p>Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated.</p> <p>There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth?</p> <p>BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.</p>
A0397	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3 Bridgnorth Place Plan Area	Not Specified	No	Not Specified	<p>The plan is not effective as there is no evidence that it is deliverable over the plan period - particularly in relation to the planned level of development in the Bridgnorth area. The level of residential development proposed in Bridgnorth far exceeds previous delivery rates. Proposals equate to 92 dwellings per annum as at 31st March 2019 (and there has been little delivery since then, meaning the actual rate required now is higher), whereas the average for the 10-year period to 2016 was some 72.8 dwellings per annum. This means proposals are at least 26% higher than past delivery rate.) There is also no evidence that there is market capacity in Bridgnorth to sustainably absorb this level of development, particularly in competition with other settlements.</p> <p>The level of employment development proposed is unclear. Policy S3.1 states 49ha will be made available to "create choice and competition in the market" (this includes 13.3ha net developable on existing allocations, part of which is for the relocation of the livestock market, 11.4ha in the Green Belt adjoining Stanmore Industrial Estate and 16ha within the proposed Tasley Garden Village). However Schedule A6 gives a figure of 37.7ha as the employment land supply for Bridgnorth, this compromises 9.1% of the total supply for Shropshire. Whilst residential proposed consist of only 5.8% of the housing supply for Shropshire. The average completion rate for the 11-year period to 2017 was 0.6ha, the Shropshire Authority Monitoring Report (2017/18) states "It is anticipated that Bridgnorth and Shifnal could both perform stronger roles in the delivery of employment development to meet demands for economic growth arising in part from the rate of housing development in these settlements but this is currently constrained by the limited availability of land for employment development", however no evidence has been provided that Bridgnorth is an attractive location for new employment development and concerned whether this is realistic given weak connectivity.</p> <p>No infrastructure plan has been prepared and a strategic transport assessment for the Bridgnorth area has not yet been carried out/reported. Without these, it cannot be evidenced that local infrastructure is adequate or that necessary improvements can be made/funded through infrastructure contributions to support sustainable delivery of the development proposals.</p> <p>The Shropshire Viability Study suggests that the proposed allocation Tasley Garden Village (BRD030) and Stanmore Garden Village may be viable, however the study notes "the Council is still working up the assessment of the strategic infrastructure and mitigation requirements for these sites" and gives a "best estimate" of infrastructure contributions. As such, consider the evidential value of the Viability Study in supporting the deliverability of these sites is low in the absence of an infrastructure plan and (in particular) a strategic transport assessment for the Bridgnorth area.</p> <p>With regard to proposed employment allocations, the Shropshire Viability Study does not separately assess the viability of employment development at Stanmore or Tasley. In reality, the employment elements of the Tasley and Stanmore Garden Village schemes are part of mixed use allocations, whilst the proposed extension to Stanmore Industrial Estate capitalises on existing on-site infrastructure. The Shropshire Viability Study indicates Office and Industrial development is generally considered unviable and larger industrial development is only marginally viable on greenfield sites. Other forms of development appear to be viable on greenfield and brownfield sites, but these are not proposed on the new employment allocations.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0396	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No
A0397	B001	<p>Provide evidence of deliverability of the scale of development proposed for Bridgnorth, this should include:</p> <ol style="list-style-type: none"> <li>1. Evidence of the market capacity to absorb the housing and employment development proposed, which significantly exceeds past rates.</li> <li>2. Evidence of the ability of local infrastructure across the Bridgnorth area (such as transport and movement) to support the scale of development and prepare an appropriate infrastructure investment plan, with sources of funding clearly identified.</li> <li>3. Provide a detailed statement of what infrastructure contributions are required from the proposed Garden Village.</li> <li>4. Re-visit viability calculations for the Garden Village developments, so they clearly include both housing and employment elements and provide a statement of what planning obligations would be expected to ensure delivery of employment alongside policy compliant housing.</li> </ol> <p>Or reduce the scale of development to nearer those historically established levels and review/identify infrastructure (including transport) required to support revised proposals.</p> <p>Identify the actual level of overall new employment development proposed for the Bridgnorth.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Draft Policy S3.1 Development Strategy: Bridgnorth Principal Centre provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.</p> <p>Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements or identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for a site.</p> <p>As part of the Local Plan Review process, Shropshire Council has engaged with key infrastructure providers and prepared/considered evidence on infrastructure capacity and needs as appropriate to inform proposed policies, including development strategies for specific settlements, and proposed allocations.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans.</p> <p>A Strategic Transport Assessment for Bridgnorth is being undertaken to inform infrastructure requirements in association with development proposals for the town, as recognised within the proposed development guidelines for site BRD030 (Tasley Garden Village).</p> <p>The Shropshire Viability Study is based on cautious assumptions regarding infrastructure requirements and contributions associated with potential development sites. However inevitably until the detailed Planning Application stage, the full infrastructure requirements and contributions for a potential development cannot be finalised, as not all necessary information will be available until this stage. Nevertheless, Shropshire Council considers the Shropshire Viability Study is a robust assessment of viability based on the information available at the strategic plan making stage.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0397	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3 Bridgnorth Place Plan Area	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan has not been justified as an appropriate strategy. It has not been demonstrated that all reasonable alternatives have been considered, and sufficient, proportionate credible evidence has not been provided. Many strategic documents are missing or lacking credible evidence. We therefore consider the plan to be “not sound”.</p> <p>No community meetings have occurred during the Regulation 19 and Regulation 18 consultation period.</p> <p>No evidence that representations made during Regulation 18 consultations have been considered.</p> <p>A reasonable alternative to the proposed approach has been presented during the Reg 18 stage of consultation, but no consideration or feedback on this proposal has been provided.</p> <p>Consider that for the Local Plan to be justified as an appropriate strategy, the following is required:</p> <ul style="list-style-type: none"> <li>-A Local Housing Need Assessment for Bridgnorth and justification for the level of housing proposed, without this a decision on the appropriateness of levels of development proposed cannot be reached.</li> <li>-Local Economic Assessment of the Bridgnorth Place Plan Area and justification for the level of employment proposed.</li> <li>-Evidence of the deliverability and viability of the employment land supply (the Shropshire Viability Study does not specifically consider this).</li> <li>-Evidence demonstrating how significant shortfalls in past delivery of jobs, housing and businesses will be addressed.</li> <li>-Justification of the proposed housing requirement (30,800 dwellings) for Shropshire, when the local housing need calculation is some 25,894 dwellings.</li> <li>-Evidence on provision of single occupancy dwellings (sub-national housing projections predict a significant proportion of growth is associated with such households).</li> <li>-Strategic Highway Assessment for Bridgnorth and explanation of how Bridgnorth can be part of the Strategic Transport Corridor.</li> <li>-Infrastructure Plan.</li> <li>-Evidence that sustainable growth, addressing Bridgnorth's low level of employment self-containment would result from planned housing and employment allocations (it is unclear whether past employment completions have kept pace with past housing completions). Existing housing allocations remain to be delivered and there remains a significant shortfall in employment delivery.</li> </ul>
A0397	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	No	Not Specified	Not Specified	<p>Consider neither the 'Gunning Principles' for consultation nor the process require within Shropshire Council's 'Statement of Community Involvement' have been adequately followed.</p> <p>Concern over compliance with 'Gunning Principles' are:</p> <ul style="list-style-type: none"> <li>-Proposals should be consulted upon at a formative stage. Proposed allocation BRD030 (Tasley Garden Village) was not included within a consultation at the formative stage and proposals were in an advanced form, with no alternatives presented and no constructive alternatives proposed in response to the consultation considered.</li> <li>-There should be sufficient information for intelligent consideration. Do not consider information provided by the promoters of BRD030 was sufficient to allow informed comments and was inaccurate.</li> <li>-There should be adequate time for consideration and response. See above.</li> <li>-'Conscientious consideration' must be given to consultation responses before a decision is reached. No feedback on how submissions have been considered and taken into account has been provided by Shropshire Council.</li> </ul> <p>With regard to the 'Gunning Principles' within the 'Statement of Community Involvement' (SCI):</p> <ul style="list-style-type: none"> <li>-Shropshire Council have not 'engaged in a timely and constructive manner'. There has been a series of consultation exercises, but responses, including from the local community, Parish Councils and Bridgnorth Plan Steering Group have been ignored and no response provided.</li> <li>-The concept of BRD030 (Tasley Garden Village) was only revealed in April 2020, with the promoters undertaking just 1 month's consultation, during the Covid-19 pandemic using a short notice video conference meeting within which many residents were unable to participate, and ending on 3rd June 2020. Shropshire Council then undertook a Regulation 18 Consultation commencing on 3rd August 2020, too short a period for consideration of such a significant change. Too short notice was also provided about proposed changes, and the level of consultation was not proportionate given the scale of proposals and significance of the proposed change. Consider a majority of residents were unaware of proposals.</li> <li>-With regard to 'constructive consultation', the local community have consistently expressed concern that a full infrastructure plan, showing deliverability and funding, is needed for a proposal on this scale and one has not been prepared. Submissions made have not been acknowledged, demonstrating a total lack of constructive consultation.</li> <li>-Shropshire Council have held only one community consultation meeting around Bridgnorth, during the first Regulation 18 Consultation. No meetings have occurred during the second Regulation 18 or Regulation 19 Consultations. Outputs from these meetings have not been considered and neither have surveys undertaken by the Bridgnorth Plan Steering Group.</li> <li>-Shropshire Council has used over-structured methods to receive submissions, to simplify administration, which has reduced lines of consistent argument to isolated comments on individual paragraphs of draft documents.</li> <li>-Methods used to inform and engage communities in the planning process have been totally inadequate.</li> <li>-The SCI requires Shropshire Council to 'provide information on how people's views have been handled, including reporting back to communities ...'. Shropshire Council has provided summaries of submissions to Regulation 18 consultations however this does not begin to meet this commitment.</li> </ul> <p>Additionally questions to Shropshire Council Cabinet on Monday 7th December 2020 were evaded - question and response appended to representation.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0397	B002	<p>Prepare proportionate and credible evidence to justify the proposed strategy and consider all available alternatives.</p> <p>Provide all evidence missing before seeking approval for submission of the draft Shropshire Local Plan.</p> <p>Modify the draft Shropshire Local Plan so that it is consistent with the 1st Edition of the Bridgnorth Plan (appendix to the representation).</p> <p>Reduce the scale of development around Bridgnorth to no more than 1,000 dwellings (including the existing SAMDev Plan allocations), do not identify a single site for development and repeat the Regulation 18 stage to ensure community involvement.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, reasons for proposing to exceed this need are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Shropshire Council also considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and national legislation. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Responses.</p> <p>All views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan. A summary of responses to each 'Regulation 18' stage consultation is available on the Shropshire Council website and form appendices of the Consultation Statement prepared for the draft Shropshire Local Plan.</p> <p>Shropshire Council considers that a proportionate and robust evidence base has been prepared to inform the Local Plan Review. This includes such evidence as a Viability Study, Local Housing Need Assessment, Strategic Housing Market Assessment, Place Plans and Strategic Infrastructure Implementation Plan, Economic Development Needs Assessment and Employment Land Review.</p> <p>A Strategic Transport Assessment for Bridgnorth is being undertaken to inform infrastructure requirements in association with development proposals for the town, as recognised within the proposed development guidelines for site BRD030 (Tasley Garden Village).</p>	No
A0397	B003	<p>Modify the draft Shropshire Local Plan in line with the 1st Edition of the Bridgnorth Plan (appendix to the representation).</p> <p>Reduce the scale of development around Bridgnorth to provide sufficient dwellings to meet the need for a 10-year land bank. Then undertake a new Site Assessment for longer-term needs, giving the opportunity to demonstrate the Statement of Community Involvement has been revisited and its requirements met.</p>	<p>Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Shropshire Council also considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Each stage of consultation has been supported by a proportionate evidence base. Following each of these stages of consultation, a summary of the responses received has been prepared and form appendices to the Consultation Statement prepared for the 'Regulation 19' Pre Submission Draft of the Shropshire Local Plan.</p> <p>With regard to proposed allocation BRD030 (Tasley Garden Village), this site was identified as a proposed allocation and subject to consultation within the 'Regulation 18' Plan Preparation stage of the Local Plan Review - specifically, within the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (August 2020 – September 2020).</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>Where following consultation it has been proposed to make amendments to proposals in response to the consultation process or indeed any other emerging evidence, this has been documented within relevant subsequent consultation documents (reflecting the iterative process undertaken during the Regulation 18 Plan Preparation stage). Furthermore where such changes relate to proposed allocations (which have been the subject of the most significant level of response) this has also been documented within updated site assessments, provided as part of the evidence and consultation material for relevant stages of consultation.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0397	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan has not been positively prepared, and is therefore not sound, because:</p> <p>-An assessment of local housing need for the Bridgnorth Place Plan Area has not been undertaken. Without this, housing need for Bridgnorth cannot have been objectively assessed. The best assessment of housing need is that undertaken by Bridgnorth District Council in 2006. Extrapolating this to 2036, 15,168 dwellings are needed by 2036, compared with the 16,200 dwellings proposed by the version draft Local Plan at that time. This has been submitted to Shropshire Council in response to Regulation 18 consultation but no feedback has been provided.</p> <p>-'Statements of Common Ground' (SoCG), prepared under the Duty to Cooperate, have not been agreed with other Local Authorities. Paragraph 2.27 of the draft Shropshire Local Plan confirms that discussions have been held but that SoCG will only be available when the plan is submitted for Examination, as such they are not available for consideration as part of the Regulation 19 consultation.</p> <p>Such SoCG would include agreement on the housing needs of adjacent and other local authorities and the extent to which they anticipate not being able to meet them - we understand that not all the other local authorities have completed their own housing needs assessments.</p> <p>Shropshire Council is proposing to contribute 1,500 dwellings to meet the needs of the Association of Black Country Authorities (ABCA). However, we note that none of the members of ABCA are directly neighbouring authorities to Shropshire. It may be more appropriate for Telford and Wrekin Council to contribute to this need. Furthermore, we can find no evidence that any financial contribution has been agreed with these authorities to cover the additional infrastructure costs that will be needed to provide for the additional 1,500 dwellings. Again, without this information we consider that the Local Plan has not been positively prepared or objectively assessed.</p>
A0398	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17	Not Specified	No	Not Specified	<p>Within the Hierarchy of Settlements Assessment undertaken to inform the draft Shropshire Local Plan, Clive has 54 points. However the convenience store has closed and there is no outdoor sports facility since the village lost its bowling green at Clive Hall due to change of ownership. Removing these points would mean Clive no longer achieves the Community Hub threshold (48 points). As such it cannot be justified for Clive to be identified as a proposed Community Hub.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0397	B004	<p>Reduce the housing requirement for Shropshire by removing the allocation for the Association of Black Country Authorities (ABCA) under the Duty to Cooperate. Under the Duty to Co-operate approach Telford and Wrekin Council to assess if housing and employment need can be met more sustainably by them. Information already provided by Bridgnorth Plan Steering Group, and others, should be taken into account during the plan-making process.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Responses to Local Plan Review consultations have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No
A0398	B001	<p>Update the Hierarchy of Settlements Assessment to remove the points attributed to Clive for the bowling green and village shop. This results in the settlements score dropping below Community Hub status. Remove Community Hub status from the settlement and undertake associated updates to the draft Shropshire Local Plan.</p>	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0399	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2	Yes	Yes	Yes	Based upon this information and evidence provided within the draft Shropshire Local Plan, it is considered to be legally compliant and sound in the required planning matters. The consultation processes, methods, processes and additional (extended) consultation periods are considered compliant with the duty to co-operate. Support draft Policy S13.2 and the associated inset maps/associated explanation; and schedule S13.2(i) site allocations in Cressage and associated explanation, and consider it to be legally compliant and sound in terms of planning law. Accessibility and sustainability of Cressage is affirmed in that whilst it in itself is sustainable settlement, it is an important local service centre for smaller rural communities on the A458 (south and west), B4380 (north) and Sheinton Road (east). The forms of residential and employment development identified to achieve the strategy for Cressage are consistent with the aims and objectives of sustainable development set out in the National Planning Policy Framework (NPPF). Proposed allocations in Cressage have been identified through a consistent approach and allow for sites proportionate in scale to Cressage. CES005 and CES006 facilitate delivery of proportionate residential development in accessible locations reflective of the settlement boundary. These offer the opportunity to provide a range of house types addressing the need for suitable and accessible housing types for current and future residents of Cressage. Redevelopment of CES006 will achieve sustainable development to the benefit of the local community and allows key opportunities to provide significant environmental improvements to the urban realm and street scene along Harley Road, in this gateway location within Cressage.
A0399	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2(i) CES006	Yes	Yes	Yes	Support the draft Shropshire Local Plan and consider it to be legally compliant and sound in terms of planning law - subject to an amendment to the proposed site guideline for CES006 to specify its capacity as around 5 dwellings. Currently text is inconsistent as the provision column states around 4 dwellings but the proposed site guidelines state an expected capacity of 2 dwellings within the former public house and 3 dwellings within the adjacent former car park.
A0400	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	No	Yes	Proposed categorisation of Key Centres, Community Hubs and Community Clusters in draft Policy SP2 and associated Schedules (SP2.1, SP2.2 and SP2.3) does not take into account whether settlements are located within the Shropshire Hills AONB. The AONB should be considered when categorising settlements and in planning/protection terms. Shropshire Council continues to 'shoe horn' AONB communities into Shropshire-wide categories and is determined to apply Shropshire-wide policies to the AONB. This approach is not 'fit for purpose', dilutes the protections that should exist for the AONB environment and landscape and is not sound.
A0400	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP24	No	No	Yes	Draft Policy DP24 is neither legally compliant or sound as it: -Does not adequately reflect or apply AONB protection within the National Planning Policy Framework (NPPF). In particular it applies an incorrect mechanistic rather than landscape led test to determine major/minor development and fails to reference para 11 of the NPPF and para 41 of the National Planning Practice Guidance (NPPG on the Natural Environment). -Does not reflect the Court of Appeal Judgment in Monkhill v Secretary of State for Housing, Communities and Local Government and Waverley Borough Council. Including in relation to application of para 172 of the NPPF to minor development. -Ignores relevant legislation re Permitted Development Rights in AONBs - no acknowledgement that as Art 2(3) some Permitted Development Rights are not applicable or establishment of a determination under Art 4 that some Permitted Development Rights as deemed incompatible with the protection of the AONB are withdrawn. -Is contradicted/negated by other Council Policies/planning practices and does not clarify primacy of draft Policy DP24 (cross references to other draft Local Plan policies without specific AONB elements - what may be suitable outside the AONB may not be suitable within it; and conflict between DP24 and other policies (such as references to Key Centres such as Church Stretton being focus for development and accommodating significant development)). -Must be clear that the framework of legislation/policies/guidance that impact development in the AONB will be proactively and fully applied (plan and decision making). -Specific wording issues, including may rather than will in relation to the AONB being a material planning consideration and development 'likely to have a significant adverse effect' rather than development that 'have the potential to have a significant adverse effect'.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0399	B001	N/A	Shropshire Council welcomes the support for Policy S13.2 and the designation of Cressage as a Community Hub. This support is welcomed as evidence of the soundness of the Draft Local Plan.	No
A0399	B002	Specify the proposed site capacity for CES006 as around 5 dwellings.	Noted. Shropshire Council considers that the approximate site capacity specified for site CES006 (around 4 houses) is appropriate. This capacity is considered likely to consist of either 1 resulting from the conversion of the existing building and 3 within the wider site or 2 resulting from the conversion of the existing building and 2 within the wider site, dependent on the nature of development undertaken.	No
A0400	B001	Communities within the Shropshire Hills AONB should be withdrawn from the Key Centre, Community Hub and Community Cluster settlement categories. Shropshire Council, the Shropshire Hills AONB Partnership and interested community groups to prepare a dedicated Development Plan Document (DPD) for the Shropshire Hills AONB.	The categorisation of settlements proposed in draft Policy SP2 (and Schedules SP2.1, SP2.2 and SP2.3) has been informed by consideration of services and facilities available within settlements. However the proposed strategy for the distribution of development has had due regard to the specific characteristics, constraints and opportunities that exist across Shropshire, including the Shropshire Hills AONB. Furthermore the proposed development strategies for specific settlements have had regard to the relevant settlements specific characteristics, constraints and opportunities, including whether it is located within the Shropshire Hills AONB. As such, Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategies for settlements within the Shropshire Hills AONB, and the existing and proposed allocations identified to contribute towards achieving these proposed development strategies are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The draft Shropshire Local Plan includes a draft Policy specifically relating to the Shropshire Hills AONB (draft Policy DP24), this combined with the proposed strategic approach and wider draft policies within the draft Shropshire Local Plan are considered an appropriate means by which to plan for development within the Shropshire Hills AONB. As such a separate Development Plan Document is not considered necessary for the area.	No
A0400	B002	Update draft Policy DP24 and its explanation as documented within the representation. Or better in the medium/long term: Shropshire Council, the Shropshire Hills AONB Partnership and interested community groups to prepare a dedicated Development Plan Document (DPD) for the Shropshire Hills AONB.	The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that as such, the proposed amendment is not necessary. No change proposed. Furthermore, the Council considers that the Shropshire Local Plan is the most appropriate mechanism for safeguarding the Shropshire Hills AONB and does not propose to prepare a separate DPD.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0400	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S5	Yes	No	Yes	<p>During the Local Plan Review, Shropshire Council has failed to recognise that Church Stretton Place Plan Area is within the Shropshire Hills AONB and properly apply appropriate AONB and National Planning Policy Framework (NPPF) obligations. As:</p> <ul style="list-style-type: none"> <li>-No assessment of local AONB/Church Stretton housing need has occurred.</li> <li>-The Sustainability Appraisal (SA) fails to include AONB specific matters.</li> <li>-Major sites were prioritised and smaller sites screened out in Church Stretton.</li> <li>-No exceptional circumstances were published until August 2020 and they are weak.</li> </ul> <p>The Windfall Allowance proposed for Church Stretton is some 121 homes (of a total residential guideline of some 200 homes). The allowance is arbitrary, results from a flawed process (failures above) and no assessment of local (AONB or Church Stretton) housing need has been attempted. Justification for housing is limited and relates to provision/retention of services whilst the SA indicates they will reduce in the long term. Shropshire Council considers settlement numbers are definitive targets, to be met or exceeded (see draft Policy SP7 which applies weight to these guidelines and failure to meet them). Such a 'target driven' approach demonstrably drives the wrong behaviour in the Shropshire Hills AONB and is likely to mean support for major development.</p> <p>Development numbers/proposals should be landscape led, respond to clear local need, demonstrate 'great weight' is given to conserving and enhancing the local environment and demonstrate that the exceptional circumstances tests have been met and are deliverable (without breaching national policy). This has not occurred.</p> <p>Shropshire Council can demonstrate a five year housing land supply (6.42 years against the housing requirement and 8 years against Governments Standard Methodology) so Church Stretton's windfall target is not sound, given it is to contribute to wider need.</p>
A0401	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Transport	Not Specified	No	Not Specified	<p>References to sustainable transport provision are vague and do not sufficiently take into account the need to address climate change as evidenced in the Decarbonisation of Transport report.</p> <p>In draft Policy DP25: New road infrastructure provision will need to be minimised (taking into account embodied carbon emissions in concrete, steel and other components and increases in Co2e emissions).</p> <p>In draft Policy DP28: Para 1 is contradictory regarding widening choice of travel and reducing car dependency. Policies need to align with central government guidance of prioritising reduction of car use in terms of distance travelled, occupancy and in the timescale of this plan ownership.</p> <p>In draft Policy DP28: Para 2 is vague, the phrase 'best transport modes' could mean anything. Restate in terms of the hierarchy - best transport modes mean those with the lowest carbon output.</p> <p>In draft Policy DP28: Para 3 includes the phrase 'promotion of passenger transport', this is insufficient. It should be modified to stress the need to embrace 'integrated transport which includes provision of information, physical connectivity of modes of transport, integration of ticketing, interchange or co-mobility hubs and most importantly integration of planning so that housing developments have public transport provision and cycling and walking networks designed prior to commencement of development.</p> <p>Para 4.254 (explanation to DP28) The current Local Transport Plan does not do what it says here; there's no evidence to support these claims. The investment in major highways is in urgent need of review given the authority has declared a climate emergency.</p>
A0402	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP10	Yes	Yes	Yes	<p>Welcome requirement in Para 5 of draft Policy DP10 that proposals for new marinas be required to demonstrate capability of the canal network to accommodate the development. To physically connect to the canal network, new marinas must obtain necessary connection agreement from the Canal &amp; River Trust, consideration of which is based on the ability of the network to accommodate the proposal in terms of availability of water resources, navigational safety considerations and potential impacts on SSSIs. However, consider minor changes to the proposed explanation of draft Policy DP10, consistent with National Planning Policy Framework (NPPF), are required to aid clarity of how this requirement can be met and how applicants can demonstrate capability of the canal network to accommodate development. This will improve the draft Policies effectiveness.</p>
A0402	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP14	Yes	Yes	Yes	<p>Generally supportive of the principles set out in draft Policy DP15.</p> <p>Consider a minor modification to para 4.138 of the proposed explanation of this draft Policy, consistent with the National Planning Policy Framework (NPPF), should be amended to aid clarity and understanding and improve effectiveness of the Policy. Specifically it should include reference to the canal network in its examples of blue infrastructure as a subset of Green Infrastructure to assist with clarity and understanding.</p>
A0402	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18	Yes	Yes	Yes	<p>Generally supportive of draft Policy DP18 and in particular reference to land instability in para 6. Paras 178a and 179 of the National Planning Policy Framework (NPPF) require consideration of site suitability to take account of risks arising from land instability and places the responsibility for securing safe development on the developer. Land stability/ground conditions are also material considerations.</p> <p>Consider the proposed explanation of draft Policy DP18, consistent with the National Planning Policy Framework (NPPF), could be expanded to provide further clarification on this matter, including examples of where such requirements could apply to aid understanding and increase effectiveness. This would also be more consistent with the approach taken in respect of other elements of the policy. For example it is often not recognised that construction in proximity to canals can adversely affect stability of cuttings and embankments, impacting on the structural integrity of canal corridors and associated infrastructure, which could result in a breach of the canal.</p> <p>The title of the policy may also need to be extended to include reference to ground conditions to reflect issues addressed and aid navigation.</p>
A0402	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP28	Yes	Yes	Yes	<p>Broadly welcomes para 3(b) of draft Policy DP28. However, the phrasing appears to indicate footways, cycleways, public rights of way and bridleways should be protected for active travel and canals to provide local transport routes to home, work, services and leisure. This should be amended so these routes are consistently addressed.</p> <p>Also, reference in para 4.252 of the explanation of draft Policy DP28 to developer contributions to improvements in transport networks should be expanded to include reference to canal towpaths. Development in proximity of canal towpaths can significantly increase their use which may require improvements to surfaces/access points to accommodate them. Keen to ensure new development mitigates any potential adverse impact on canal towpaths and maximise opportunities for use where appropriate and meeting necessary statutory tests for planning obligations. This will aid in clarity and effectiveness.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0400	B003	Windfall Allowance of 121 dwellings should be removed from the Church Stretton Place Plan numbers and the Residential Guideline for Church Stretton.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Church Stretton and the existing commitments (including the existing allocations) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities, including its location within the Shropshire Hills AONB.	No
A0401	B001	Draft Policy DP28 should be amended as follows: Para 1 needs to align with central government guidance of prioritising reduction of car use in terms of distance travelled, occupancy and in the timescale of this plan ownership. Para 2 should refer to the transport hierarchy. Para 3 should include embracing 'integrated transport which includes provision of information, physical connectivity of modes of transport, integration of ticketing, interchange or co-mobility hubs and most importantly integration of planning so that housing developments have public transport provision and cycling and walking networks designed prior to commencement of development.	The need to reduce traffic and encourage alternative travel options is a theme running throughout the Plan and given particular emphasis in Policy DP28: Communications and Transport in relation to the Hierarchy of Sustainable Transport. The Local Plan places an emphasis on the location of new development in existing urban centres and the wording of many policies supports pedestrian, cycling and other sustainable transport options. This is supported and informed by the Sustainability Appraisal and site assessment process which contain criteria aimed at minimising car-based travel and encouraging walking and cycling or the use of public transport for longer journeys. The Local Plan seeks to ensure that new development provides opportunities to use other more active modes of transport and that these networks of footways and cycleways will link into the existing pedestrian, cycling, public rights of way and canal networks. The wider issues relating to the management of the highways network and transport systems in the County are matters to be addressed through the Local Transport Plan. Shropshire Council is currently preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.	No
A0402	B001	Advise applicants of new marinas to either undertake pre-application discussions on this matter with the Canal & River Trust, consistent with para 40 of the National Planning Policy Framework (NPPF), or provide evidence of the Canal & River Trust agreement to any necessary connection.	Noted, however the proposals suggested are already expressed in the NPPF and so it is unnecessary to repeat these in the Local Plan (i.e. para 40, NPPF: "Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.").	No
A0402	B002	In para 4.138 of the proposed explanation of draft Policy DP15, include reference to the canal network in the examples of blue infrastructure as a subset of Green Infrastructure to assist with clarity and understanding.	The Council does not consider this amendment to be necessary	No
A0402	B003	Amend the proposed explanation of draft Policy DP18, to include examples of where land instability requirements/considerations could apply. For example it is often not recognised that construction in proximity to canals can adversely affect stability of cuttings and embankments, impacting on the structural integrity of canal corridors and associated infrastructure, which could result in a breach of the canal. Revise the title of draft Policy DP18 to include reference to ground conditions.	The Council considers that the policy addresses all relevant issues appropriately. No change proposed.	No
A0402	B004	Para 3(b) of draft Policy DP28 should be reworded to consistently reference: footways, cycleways, public rights of way, canal towpaths and bridleways as being protected for active travel and to provide local transport routes to home, work, services and leisure. Para 4.252 of the explanation of draft Policy DP28 should include reference to developer contributions to improvements to canal towpaths.	The wording of Policy DP28(3)(b) sets out the objective sought in the proposed modification in relation to the measures that need to be taken by developers and the Council to protect, extend and improve these networks but DP28(3)(b) would benefit from the identification of canal towpaths. It is proposed that DP28(3)(b) be modified through the insertion of the words "canal towpaths" in the list of local access routes and to clarify the role of the canal network. In relation to developer contributions to improve canal towpaths this would have a very specific locational application to developments located on or close to the canal network. In these instances the need for an investment in the canal network would have to be shown to be relevant and necessary to the proposed development. This requirement may not be placed on any and every development determined by the Council but where it is necessary it may be required under the proposed wording in Policy DP28(3)(b).	Yes

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0402	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S8.1	Yes	Yes	Yes	Consider draft Policy S8.1 should include reference to the future sustainable reuse of Ellesmere Yard. This will provide some degree of clarity in respect of future aspirations for long term sustainable re-use of Ellesmere Yard, thereby planning positively for such reuse and improving the plans effectiveness. Ellesmere yard (outside the proposed development boundary and not proposed for allocation) contains a historically significant cluster of Canalside buildings. However, buildings are no longer appropriate to fulfil the canal's operational needs and a long term sustainable use must be provided to safeguard them. At an early stage of exploring opportunities for reuse, although one option is a hub for the community and a site for tourism and leisure uses (improved connectivity with the town, including a new pedestrian bridge crossing of the canal, has been raised in recent consultations and is seen as key to bringing forward a successful scheme for this area). Note reuse of these buildings may be considered appropriate in the context of other more general draft Policies and as such allocation is not thought to be necessary or appropriate. However, a more general reference to aspirations for reuse/regeneration of this area and improved connectivity with the town in draft Policy S8.1 would be both appropriate and beneficial, providing greater clarity in respect of future aspirations for regeneration of this important area and enable it to be considered in the context of wider development proposals in the area including future connectivity. Consider the site clearly provides the opportunity to secure significant benefits to the town and its community. The Canal & River Trust is likely to continue to require an operational yard at Ellesmere and is examining how this can be met.
A0402	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1 (MDR012)	Yes	Yes	Yes	Consider minor changes are required to the proposed site guidelines for MDR012 to improve accuracy, effectiveness and provide greater clarity regarding the consideration of the adjoining canal. Specifically: -Reference is made to a proposed marina (pedestrian and cycle links between it and the town). This is misleading as no site for a marina is proposed within the draft Shropshire Local Plan. Reference should be amended instead to the canal, which could in any event help facilitate access to a potential future marina. This sentence should also be amended to include reference to enhancement of pedestrian and cycle links adjacent to the site, such as the canal towpath (increased use associated with nearby development may necessitate improvements to surfaces/access points to accommodate it). -Reference is made to reflecting/respecting heritage assets. Whilst this would likely include the canal corridor, would ask specific reference to future development positively addressing the adjoining canal and the opportunities it presents. -Reference should be made to the site design and layout positively addressing the adjoining canal corridor and ensuring no adverse impact on its character, heritage, ecology or structural integrity. -Reference is made to planting of large trees. This may not be appropriate given potential impact on canal infrastructure. This should be amended to provision of an appropriately design landscaping scheme, incorporating native species and, where appropriate, sustainable planting of large trees within the green infrastructure and public open space...
A0402	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1 (MDR034)	Yes	Yes	Yes	Consider minor changes are required to the proposed site guidelines for MDR012 to improve accuracy, effectiveness and provide greater clarity regarding the consideration of the adjoining canal. Specifically: -Reference is made to a proposed marina (pedestrian and cycle links between it and the town). This is misleading as no site for a marina is proposed within the draft Shropshire Local Plan. Reference should be amended instead to the canal, which could in any event help facilitate access to a potential future marina. This sentence should also be amended to include reference to enhancement of pedestrian and cycle links adjacent to the site, such as the canal towpath (increased use associated with nearby development may necessitate improvements to surfaces/access points to accommodate it). -Reference is made to reflecting/respecting heritage assets. Whilst this would likely include the canal corridor, would ask specific reference to future development positively addressing the adjoining canal and the opportunities it presents. -Reference should be made to the site design and layout positively addressing the adjoining canal corridor and ensuring no adverse impact on its character, heritage, ecology or structural integrity. -Reference is made to planting of large trees. This may not be appropriate given potential impact on canal infrastructure. This should be amended to provision of an appropriately design landscaping scheme, incorporating native species and, where appropriate, sustainable planting of large trees within the green infrastructure and public open space...
A0402	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1 para 5.155	Yes	Yes	Yes	Note the aspiration for a new marina in Market Drayton, but no site is specifically allocated for a marina. Para 5.155 of the proposed explanation to draft Policy S11.1 specifies the Canal & River Trust do not support allocation of marina developments in Local Plans. Whilst this is correct, consider an explanation should be provided. Specifically the Canal & River Trust make decision on whether connecting marinas to the canal network is appropriate based on consideration of water resources, navigational safety considerations and any potential impacts on SSSIs. Applications need to be considered cumulatively and water cannot be reserved indefinitely (new schemes may come along or environmental factors may change). As such allocations could become undeliverable. Therefore, consider it is appropriate for marina proposals to be dealt with by means of appropriate criteria based policy (such as draft Policy DP10) or, where necessary, identified as a potential use within a more general site allocation, for example for leisure/tourism use. As such, consider minor changes to para 5.155 of the proposed explanation to draft Policy S11.1 to improve accuracy. Consider reference to the principle of a marina development in para 5.155 of the proposed explanation to draft Policy S11.1 should be amended to indicate that it "MAY" be capable of delivery rather than "IS" capable of delivery. All references to the "Canals and Rivers Trust" (and any other similar reference in the plan) should be corrected to "Canal & River Trust".



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0402	B005	Include a new sentence in draft Policy S8.1 referring to aspirations to secure the long term sustainable reuse of Ellesmere Yard and its improved connectivity to the town.	Noted. Given the location and nature of the Ellesmere Yard site, it is considered appropriate that the site remains outside the proposed development boundary for Ellesmere and as such 'countryside' for planning policy purposes. It is considered that draft Policy SP10 which is the starting point for managing development in the countryside provide an appropriate framework for managing sites such as the Ellesmere Yard.	No
A0402	B006	Amend the proposed site guidelines for proposed allocation MDR012 to: -Remove reference to the proposed marina and instead reference the canal towpath. -With regard to enhancements to pedestrian and cycle links through the site, also reference adjacent to the site. -Include reference to future development positively addressing the adjoining canal and the opportunities it presents. -Include reference to site design and layout positively addressing the adjoining canal corridor and ensuring no adverse impact on its character, heritage, ecology or structural integrity. -Require an appropriately design landscaping scheme, incorporating native species and only where appropriate the sustainable planting of large trees.	Shropshire Council considers that the proposed development strategy for Market Drayton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Some of the points raised are covered in other policies within the draft Shropshire Local Plan, such as SP5: High Quality Design or would be a discussion to be had during the planning application process. With regard to the draft site guideline regarding pedestrian and cycle links for proposed allocations MDR012 and MDR034, a minor modification is proposed to recognise these links should also be to the canal towpath.	Yes
A0402	B007	Amend the proposed site guidelines for proposed allocation MDR012 to: -Remove reference to the proposed marina and instead reference the canal towpath. -With regard to enhancements to pedestrian and cycle links through the site, also reference adjacent to the site. -Include reference to future development positively addressing the adjoining canal and the opportunities it presents. -Include reference to site design and layout positively addressing the adjoining canal corridor and ensuring no adverse impact on its character, heritage, ecology or structural integrity. -Require an appropriately design landscaping scheme, incorporating native species and only where appropriate the sustainable planting of large trees.	Shropshire Council considers that the proposed development strategy for Market Drayton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Some of the points raised are covered in other policies within the draft Shropshire Local Plan, such as SP5: High Quality Design or would be a discussion to be had during the planning application process. With regard to the draft site guideline regarding pedestrian and cycle links for proposed allocations MDR012 and MDR034, a minor modification is proposed to recognise these links should also be to the canal towpath.	Yes
A0402	B008	Amend para 5.155 of the proposed explanation to draft Policy S11.1 to: -Explain why the Canal & River Trust are not supportive of allocating sites for marinas. -Specify that the potential marina "MAY" be capable of delivery rather than "IS" capable of delivery. -All references to the "Canals and Rivers Trust" (and any other similar reference in the plan) should be corrected to "Canal & River Trust".	Noted. It is not the role of the draft Plan to specify why proposals/sites are not included within it. Shropshire Council has positively responded to previous representations from the Canal & River Trust in that the draft Plan does not specifically seek to allocate land for a Marina, and instead policies S11.1, DP10 and SP7 provide a sufficient policy framework should such a proposal come forward during the plan period. CIL contributions from this and other development sites can of course contribute towards the a delivery of a marina. However, for the sake of clarity, a minor modification is proposed regarding the suitability of the marina. A modification is proposed to correct references to Canals and Rivers Trust.	Yes

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0403	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14 (WHN024)	Yes	Yes	Yes	Support classification of Whittington as a proposed Community Hub, which is considered a significant rural service centre. Support allocation of site WHN024 for the development of 70 dwellings. The site is viable and deliverable within the first five years of the Local Plan Review period, consistent with draft Appendix A7. It is also considered that development of WHN024 is capable of complying with draft Policy SP7. A highway report (summarised within the representation) confirms appropriate access consistent with proposed guidelines can be achieved, whilst traffic calming/extension of the 30mph zone/pedestrian footways will be investigated in support of any future Planning Application. Heritage and ecology assessments would also be undertaken at this stage. High quality design and layout (range of house types and sizes including necessary affordables), biodiversity enhancements, habitat enhancement/mitigation (including retention of mature trees) and sustainable drainage (informed by a sustainable drainage strategy) would be achieved. Consider it can positively respond to any mitigation measures associated with Cole Mere. Potential additional land (0.3ha) promoted, which would allow for a direct pedestrian link into the centre of Whittington (plan appended to representation) and open space provision/enhanced tree planting. Query why within the Sustainability Appraisal (SA) WHN024 is identified as being within a conservation area (Section 13), not within proximity of a bus stop (Section 6) and not within 480m of a mobile library (Section 5). Consider the SA score should increase by 3 points.
A0404	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.
A0404	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '.. will make provision for the needs of the town and surrounding hinterland...'? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?
A0404	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0403	B001	Do not consider changes are necessary to site allocation WHN024.	Noted.	No
A0404	B001	Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored. Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.	Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.	No
A0404	B002	Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years). Provide evidence that Bridgnorth can sustain a 35% population increase.	Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development. There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.	No
A0404	B003	The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.	Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers. Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0404	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?
A0404	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.
A0404	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0404	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0404	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0404	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0404	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0404	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0405	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.
A0405	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '... will make provision for the needs of the town and surrounding hinterland...'? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0404	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0404	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No
A0405	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No
A0405	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0405	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.
A0405	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?
A0405	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.
A0405	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0405	B003	The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.	Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers. Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."	No
A0405	B004	What areas / units are already available for occupation and how long have they been vacant? What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19. If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?	Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection. Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity. Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market. Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.	No
A0405	B005	Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing. Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences. Provide details of how noise and odour can be mitigated in these circumstances.	Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection. Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity. Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market. Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.	No
A0405	B006	What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur. Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458. Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0405	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0405	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0406	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.
A0406	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '... will make provision for the needs of the town and surrounding hinterland...'? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0405	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0405	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No
A0406	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No
A0406	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0406	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.
A0406	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?
A0406	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.
A0406	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0406	B003	The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.	Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers. Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."	No
A0406	B004	What areas / units are already available for occupation and how long have they been vacant? What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19. If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?	Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection. Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity. Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market. Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.	No
A0406	B005	Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing. Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences. Provide details of how noise and odour can be mitigated in these circumstances.	Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection. Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity. Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market. Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.	No
A0406	B006	What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur. Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458. Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0406	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0406	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0407	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.
A0407	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '... will make provision for the needs of the town and surrounding hinterland...'? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0406	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0406	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No
A0407	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No
A0407	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0407	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.
A0407	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?
A0407	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.
A0407	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0407	B003	The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.	Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers. Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."	No
A0407	B004	What areas / units are already available for occupation and how long have they been vacant? What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19. If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?	Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection. Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity. Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market. Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.	No
A0407	B005	Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing. Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences. Provide details of how noise and odour can be mitigated in these circumstances.	Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection. Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity. Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market. Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.	No
A0407	B006	What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur. Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458. Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0407	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0407	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0408	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.1 Oswestry PKH002	Not Specified	No	Not Specified	Significant development already occurred in this area already. Insufficient infrastructure, school capacity and poor roads.
A0409	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.1 Oswestry PKH002	Not Specified	No	Not Specified	Significant development already occurred in this area already. Insufficient infrastructure, school capacity and poor roads.
A0410	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	Not Specified	Consultation has not been carried out in conformity with an up-to-date and adopted Statement of Community Involvement (SCI), because such an SCI did not exist at the time of this consultation, and the Gunning principles of consultation. -The SCI (2011) is out of date from 6th April 2018, by virtue of regulation 10A of TCP (Local Planning) (England) (Amendment) Regulations 2017/1244 requiring it to be reviewed. In recognition of this, a new SCI has been prepared and is subject to consultation alongside the Regulation 19 consultation on the draft Shropshire Local Plan (Appendix to this representation includes response to the consultation on the new SCI). -Consider Shropshire Council have not conscientiously taken into account the product of consultation in a proper manner, as required by the Gunning Principles. Responses to the first two consultations show people and Town and Parish Council's were overwhelmingly against high option, yet this is pursued. The Council's response is the consultation was not a referendum; although the majority supported lower options, a good level of support existed for the highest option; the Council knows what is best for most people; the consultation was looking for good arguments; and if there is disagreement the case could be argued in front of an Inspector. -During the last Regulation 18 consultation availability of evidence was queried. The Council indicated these documents would be available for the Regulation 19 consultation, however key documents listed in Appendix 3 of the draft Shropshire Local Plan (notably an up-to-date Authority Monitoring Report, last publication was 2017) remain missing. Without this, no up-to-date evidence on performance during the first four years of the proposed Plan period, as such consultees do not have before them sufficient reasons to allow them to intelligently consider whether the draft Shropshire Local Plan is likely to achieve its goals within the remaining 18 years of its proposed Plan period. -The draft Shropshire Local Plan and supporting evidence is very extensive (Appendix to this representation catalogues this material). Because of this volume (some of which is new) consider a longer consultation period was appropriate - extension to 10 weeks due to Covid 19 restrictions was welcome, but consider there are good reasons for at least 12 weeks of consultation.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0407	B007	Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030. Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision. Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators." Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.	No
A0407	B008	Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional. Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat. Explain the measures to be taken to improve air quality in Bridgnorth. Explain how noise and odour will be mitigated. Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?	Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers. Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."	No
A0408	B001	n/a	The preferred allocations situated in Park Hall are to address the need for Oswestry town, due to the town's constraints, over the Plan period in conjunction with those allocation from SAMDev. As per the site guidelines, various infrastructure will be required for development to be acceptable and compliant with the emerging plan.	No
A0409	B001	n/a	The preferred allocations situated in Park Hall are to address the need for Oswestry town, due to the town's constraints, over the Plan period in conjunction with those allocation from SAMDev. As per the site guidelines, various infrastructure will be required for development to be acceptable and compliant with the emerging plan.	No
A0410	B001	The Regulation 19 consultation on the draft Shropshire Local Plan should be re-run when all key evidence has been published. The Draft Shropshire Local Plan should be amended to reflect the fact that Members of the Public, Town and Parish Councils and Local and National Interest groups are all overwhelmingly in favour of lower housing targets.	Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Each stage of consultation has been supported by a proportionate evidence base. Following each of these stages of consultation, a summary of the responses received has been prepared and form appendices to the Consultation Statement prepared for the 'Regulation 19' Pre Submission Draft of the Shropshire Local Plan. Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan. It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy. Where following consultation it has been proposed to make amendments to proposals in response to the consultation process or indeed any other emerging evidence, this has been documented within relevant subsequent consultation documents (reflecting the iterative process undertaken during the Regulation 18 Plan Preparation stage).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0410	B002	Sustainability Appraisal	Whole Document	No	No	Not Specified	<p>In para 2.19 of the Sustainability Appraisal (SA) reference to SO1 needs changing to SO3.</p> <p>-Development will occur not just at the boundary of a site. For Criteria 6, the measurement of 480m should have been taken from the centre of the site, not from its boundary. The same applies to Criteria 5.</p> <p>-The detailed criteria listed against Criteria 4/5 and 6 should have a better match with those listed in Table 1 of the Hierarchy of Settlements (HoS) document. The simplistic, binary scoring criteria used in the SA does not match the sustainability criteria used in the HoS of villages to determine their suitability as Community Hubs. There is no similar weighting of the relative importance of each criteria.</p> <p>-The scoring system used in the stage 2a (site assessment) should use absolute scores, not scores that are relative only to other sites in that particular settlement - the implication is that the best sites within a settlement are picked out, with little reference as to how they fit in to a county-wide standard.</p> <p>-To assess the CO2 emissions saving potential of a site, it seems insufficient only to consider the items within Criteria 4/5 and 6. Other factors could have included the propensity of the site for solar gain (e.g. north facing or south facing), or the distance from a supermarket.</p> <p>-The whole methodology as summarised in Diagram 1.1 at page 5 of the SA is undermined when it is possible to override a highly negative sustainability score, as is the case with the Ironbridge site, by proposing mitigation measures. The implication is that the site has been allocated for other reasons than sustainability, and in spite of the sustainability appraisal process.</p> <p>-Little thought has gone into how well a site might help achieve carbon saving goals.</p>
A0410	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	Not Specified	No	Not Specified	<p>Shropshire Council declared a climate emergency in May 2019, recognising the overwhelming importance of climate change considerations. Surprisingly, this declaration is mentioned only twice in the whole Draft Shropshire Local Plan, so there is little sense of an emergency within it.</p> <p>Shropshire Council was also one of the founders of the Shropshire Climate Action Partnership (SCAP) and has strongly supported SCAP's work to develop its Zero Carbon Shropshire (ZCS) Plan. However, there is no sense of the importance of this within the draft Spatial Vision or draft Policy SP1.</p> <p>To that extent, draft Policy SP1 is unsound. Suggest the draft Spatial Vision is incorporated within draft Policy SP1 and the text is amended to better reflect the over-riding importance of the climate emergency.</p>
A0410	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	No	No	No	<p>Little sense of the Climate Emergency declared by the Council within the draft Shropshire Local Plan. The Council's recently prepared Corporate Climate Strategy is not available on the evidence base webpage, this indicates the Council's intention to lead by example and identifies a key objective of reducing Shropshire Council's greenhouse gas emissions to net carbon zero by 2030, necessary urgency to achieve this not contained in the draft Shropshire Local Plan. Shropshire Council was also one of the founders of the Shropshire Climate Action Partnership (SCAP) that prepared a Zero Carbon Shropshire (ZCS) Plan. This identifies 45% of Shropshire's carbon footprint is associated with people's everyday activities being at home, work and travelling and a further 46% is associated with imported goods, therefore every effort should be made to minimise the increase in the number of buildings as long as they are not carbon neutral/negative.</p> <p>-The proposed housing requirement (30,800 dwellings) in draft Policy SP2 is significantly more than the minimum Local Housing Need (LHN) calculated using Government's standard methodology (30,800 compared with 25,894) - table and graph provided within the representation illustrating the components of LHN and the proposed housing requirement, in summary 12,490 dwellings to accommodate population L1390increase, 8,256 dwellings to accommodate changes in household size (surprisingly large due to changes (2.5% reduction in size) applying to all of the population, rather than just the new population), 5,148 dwellings for the affordability uplift (that this will make housing more affordable is widely considered misguided, the Letwin Review indicates house builders will continue to "drip-feed" houses to the market because it is not in their interests to cause a reduction in the price of their product), 1,500 dwellings to meet unmet needs arising in the Black Country, and 3,406 dwellings for Shropshire Council aspirations. 30,800 dwellings are proposed for a population increase of 28,380 people. Consider the high figure is not justified by proportionate or robust evidence. Also, taking account of the climate emergency and associated ecological emergency (overriding considerations), growth/exploitation of resources should be optimised (kept to a minimum level consistent with other needs) not maximised. Therefore balance of evidence justifies building no more than the absolute minimum number of dwellings required by Government.</p> <p>-The proposed employment land requirement (300ha) in draft Policy SP2 is unreasonably high, based on questionable data/not justified by proportionate evidence and are inconsistent (other data/internally). Partly founded on the aim of the Economic Growth Strategy to 'maximise our economic potential', this is contrary to climate change goals. The preferred strategy is balanced growth, this is a sensible aim, but the calculation of employment land required is overstated (representation outlines calculation detailed in the Preferred Scale and Distribution of Development consultation document, in summary 1 job per household, 42.25sq.m per job, 10,000 sq.m per ha and workspace equates to 40% of the overall site). Proposed employment guidelines for many settlements in previous stages of consultation on the Local Plan Review and the draft Shropshire Local Plan reflect this calculation, although those for Bridgnorth (subsequently further increased) and Shifnal were increased to take account of largely unspecified 'local circumstances'. Guideline for some other settlements have also subsequently been 'tweaked' beyond this equation of balance, most notably Shrewsbury, Oswestry, Market Drayton and Craven Arms. Query whether proportionate evidence is available to justify all these figures.</p> <p>Two main queries with the calculation of employment land are whether an appropriately justified employment density has been adopted (a major aim of the Shropshire Economic Growth Strategy is increased productivity (improving median earnings, entailing higher-skilled jobs), this is at odds with the assumption that each job requires 42.25sq.m as this includes 25% as warehouse style jobs. Further, within the Council's evidence/Local Plan process, alternative and more productive employment densities have been applied, for instance the Oxford Economic Forecasts (underpin the Economic Growth Strategy) apply a 31sq.m job density), and whether each new dwelling is likely to require a new job (not all occupants of new houses will have jobs which require employment land, some occupants will already have jobs, many occupants will be beyond working age and not all jobs require dedicated employment sites. It therefore seems likely that each house will produce less than one job requiring employment land. This inevitably ought to decrease the calculation of the requirement for employment land). Alternative calculation of employment land using a job density of 31sq.m and allowing for households formed as a result of population change, half of houses resulting from the affordability ratio adjustment (much if not all of this is already within the workforce) unmet cross boundary need and Council aspirations results in a need for 155ha, around 52% of the proposed employment land requirement.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0410	B002	The SA is not a reliable guide to the true sustainability of any one site and should not be relied on as a determinant of allocated sites.	The Planning and Compulsory Purchase Act 2004 requires SA to be carried out for new or revised Local Plans and as such SA is an important consideration in the site assessment process. However, as the Council's site assessment documents show, SA is one of many considerations of the suitability of a site for housing or employment use. It is thus not the main determinant. No change proposed.	No
A0410	B003	Incorporate the spatial vision into draft Policy SP1. Amend the spatial vision (including completion of the transition to a zero carbon economy by 2030, providing all residents access to zero carbon homes and optimising economic productivity consistent with zero carbon aims) and draft Policy SP1 (including all new development to be zero carbon by 2030) to better reflect the climate emergency - proposed wording provided within the representation. Include reference to Shropshire Climate Action Partnership's Zero Carbon Shropshire Plan.	Noted. The draft Shropshire Local Plan should be read as a whole. It is considered that the draft Shropshire Local Plan identifies an appropriate vision and framework for the future development of Shropshire to 2038 and addresses such issues as enabling adaptation to climate change. This positively responds to the climate emergency declared by Shropshire Council. With regard to the draft Spatial Vision, it recognises the importance of and identifies the need to move positively towards a zero-carbon economy. With regard to draft Policy SP1, it recognises the need for development to make settlements more sustainable and addresses the causes and mitigate the impacts of climate change.	No
A0410	B004	Reduce the housing requirement in draft Policy SP2 from 30,800 to no more than Government's minimum requirement of 25,894 dwellings. Reduce the employment land requirement in draft Policy SP2 from around 300ha to the lower end of the Economic Development Needs Assessment (EDNA) range of 132ha to 234ha. Own figure is around 155ha. Amend employment land guidelines for settlements in draft Policies S1-S21 so they total the overall employment land requirement. Amend Appendix 6 into the same format as Appendix 5. Both should show totals. Contributions (under the duty to cooperate) to unmet cross boundary need arising within the Black Country (1,500 dwellings and up to 30ha of employment land) should be removed until such time as the Black Country Plan is mature and Shropshire's proposed share of unmet need arising in the Black Country can be justifiably evidenced to be proportionate to local authorities with a closer functional relationship to the Black Country. Ditton Priors, Cross Houses, Woore/Irelands Cross, and Knockin should be removed from the list of Community Hubs in Schedule SP2.2.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan. With regard to this evidence, we would note that calculations of the employment land requirement are based on the national assumption that employment land when developed, delivers 40% net floorspace from the gross land area, and that new employment is generated on that basis. However, available evidence suggests that employment land when developed, delivers on average 25% net floorspace in Shropshire. This has been given careful consideration when determining an appropriate employment land requirement. Furthermore, we would also note that the proposed employment land requirement actually represents a reduction to that within the adopted Local Plan (whilst the housing requirement has actually increased). The proposed employment land requirement incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan. In order to achieve the proposed employment land requirement, respond to the wider range of employment uses and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038. Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. It is considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan. The proposed employment land guidelines for settlements provide appropriate choice and competition within the market, recognise the role of larger settlements as the focus for growth supporting their surrounding hinterland, and also respond to specific circumstances and opportunities that exist within settlements. The strategies for each settlement and the existing and proposed allocations identified to contribute towards achieving these proposed development strategies are considered appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Appendices 5 and 6 of the draft Shropshire Local Plan are considered appropriate for presenting information on housing and employment land supply. It is perhaps inevitable that they vary given they present information on different issues. For clarity a minor amendment is proposed to remove reference to employment development guidelines in relation to Appendix 6. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent.	Yes

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0410	B004 Cont'd						<p>There are also two inconsistencies in the employment figures, these are the Economic Development Needs Assessment (EDNA) identifies an employment land need for between 132ha and 234ha, this is a long way short of the stated employment land requirement of 300ha, and the guidelines for individual settlements total some 375ha, wholly inconsistent with the 300ha employment land requirement.</p> <p>-Proposed housing and employment land requirements in draft Policy SP2 include 1,500 dwellings and 30ha of employment land towards unmet cross-boundary need arising within the Association of Black Country Authorities (ABCA) area. However there is no statement of common ground (SoCG) between Shropshire and ABCA and such discussions should not occur in isolation from other local authorities in the West Midland Combined Authority (WMCA) area - a joint SoCG should be prepared. Shropshire should not be expected to take unmet need disproportionate to its geographical distance from ABCA/presence of Green Belt, nor disproportionate to what other local authorities are accepting. Given lack of such evidence to justify accepting ABCA need and also because of the current stage of the ABCA plan, consider it is premature for Shropshire Council to accept any unmet need from ABCA.</p> <p>-Evidence to inform identification of proposed Community Hubs provided within the Hierarchy of Settlements Assessment (HoS). The scoring system in the HoS is overly simplistic, attributing the same scores to towns and villages for services/facilities where towns have them to a much greater degree (particularly libraries (permanent library and library bus once a fortnight), public transport (rudimentary services versus extensive services/bus stations), employment (limited versus extensive)). This may be addressed with a more nuanced scoring system and relative scores amongst villages would produce a similar hierarchy. The scoring system in the HoS also fails to give any special weight to more important services/facilities (school or bus service). This is a more fundamental question as to whether proposed Community Hubs are truly sustainable (valid argument that building in rural locations is fundamentally less sustainable than urban locations). The HoS indicates some of the proposed Community Hubs do not satisfy the Council's definition of what facilities a Community Hub should have (table provided in representation demonstrates some proposed Community Hubs do not have schools, any public transport or employment opportunities - in reality, most living in villages commute elsewhere for employment, one reason why rural villages are unsustainable locations for further development, however, lack of a school and public transport indicates a further level of unsustainability). Balance of evidence indicates some of the proposed Community Hub do not satisfy the Council's definition of sustainability/objective definition of sustainability. These are Ditton Priors, Cross Houses, Woore/Irelands Cross, and Knockin. There is also doubt about Clun, Hinstock, Cosford, and Trefonen.</p> <p>Table summarising housing and employment supply by category and settlement provided within representation.</p> <p>Appendix 5 should include a total of the housing land supply. Appendix 6 should include a total of the employment land supply and does not include the settlement guidelines.</p>
A0410	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	No	No	Not Specified	<p>The climate emergency and associated ecological emergency (overriding considerations) mean growth/exploitation of resources should be optimised (kept to a minimum level consistent with other needs) not maximised. This is corroborated by planning legislation and policy (Section 19 of the 2004 Planning and Compulsory Purchase Act (as amended) and paras 148-149 of the National Planning Policy Framework (NPPF)).</p> <p>The draft Shropshire Local Plan is required to demonstrate how policies are in line with legally binding carbon emission reduction targets in the Climate Change Act. It should take into account baseline emissions; robustly evaluate future emissions (all sources taking into account requirements in national legislation) and a range of development scenarios; and adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act (100% reduction by 2050).</p> <p>To be sound in relation to Climate Change policy, the draft Shropshire Local Plan/evidence base should set out a carbon budget for the whole Shropshire Council area (consistent with the updated Climate Change Act), and a strategy as to how to achieve it.</p> <p>Draft policies should aim to radically reduce carbon emissions in line with a trajectory for the Plan consistent with the UK achieving full carbon neutrality by 2050 and in the short term should test policy options available to achieve the highest level of ambition possible to meet this goal. To the greatest extent possible, all new development should be zero carbon given that the country's net zero target must be met in the next 30 years. This has not been done within the Draft Shropshire Local Plan.</p> <p>References to reducing carbon emissions are general rather than objectively measurable as required, this is not legally sound in terms of climate change mitigation policies and duties.</p> <p>Para 3.29 of the explanation to draft Policy relates to climate change and the need to minimise carbon emissions, but draft Policies do not bear out the sense of urgency identified.</p> <p>Para 1a of draft Policy SP3 relates to minimising the need to travel/maximising ability to travel by sustainable modes, this is weak to the point of being unsound because no sense of how much this will contribute to reducing emissions; large part of development proposed for rural settlements which rely on the private motor car for transport; and no integrated active travel plan to promote sustainable modes of transport/make them the dominant form of transport is available.</p> <p>Para 1g of draft Policy SP3 promote fabric energy efficiency retrofits of existing buildings. This is constructive as a general, high level statement, but aims should be reflected in draft Policy DP23 (main policy covering numerous listed buildings in Shropshire).</p> <p>Para 2d of draft Policy SP3 supports community energy proposals, but this is not taken up or elaborated upon in draft Policy DP26.</p> <p>Para 3 of draft Policy SP3 is about maximising carbon sequestration, but this could be better integrated into draft Policies DP14 and DP16, neither of which make any further mention of sequestration.</p> <p>Para 4 of draft Policy SP3 makes good mention of climate change adaptation, but would benefit from more detail on how new development is to integrate climate adaptation measures (draft Policy DP14 does however cross refer to draft Policy SP3).</p>
A0410	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	No	Not Specified	<p>Consider not enough affordable houses are built and there is no coherent Policy to get houses for different need groups into the right places.</p> <p>With regard to affordable housing, the draft Shropshire Local Plan targets 25% of housing to be affordable, whilst proposing 10% from sites on the north and 20% from sites in the south. This will make the problem of the overall inadequate proportion of affordable houses worse, not better. Part of the problem is viability, more of this challenge could be taken on through the Council's housing company.</p> <p>With regard to needs of different groups, the Shropshire Strategic Housing Market Assessment (SHMA) sets out the housing needs of different segments of society, but draft Policies in the draft Shropshire Local Plan do not really take any significant notice of it.</p> <p>More Right Home Right Place Surveys should be undertaken to identify housing needs of Parish across Shropshire.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0410	B004 Cont'd			
A0410	B005	<p>The Draft Shropshire Local Plan must include a carbon budget and a strategy for achieving it.</p> <p>Intentions within draft Policy SP3 must be cascaded to the development management policies in a more concrete manner.</p>	<p>There is no requirement in national planning policy or other legislation for a Local Plan to set a carbon budget and therefore the Council considers this is not necessary.</p> <p>The Council considers that draft Policy DP11 appropriately supports the strategic intentions of draft Policy SP3.</p>	No
A0410	B006	<p>Include a Policy to enable affordable housing developments to be achieved more easily, where housing needs surveys have indicated a particular need for affordable housing.</p> <p>Draft Policy SP7 should be amended to take account of the housing needs of the different segments of society, as evidenced in the Shropshire Strategic Housing Market Assessment (SHMA).</p>	<p>The draft Shropshire Local Plan should be read as a whole.</p> <p>Shropshire Council considers that draft Policies DP3-DP7 provide an appropriate and effective policy framework for the delivery of appropriate affordable housing.</p> <p>Shropshire Council also considers that the needs of particular groups within society have been considered and the draft Policies provide an appropriate and effective policy framework that appropriately responds to these needs.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0410	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	No	Not Specified	CPRE's report 'local green space: State of the Green Belt 2021' documents the importance as accessible countryside to towns and cities and the gradual erosion of the Green Belt. Do not consider proposed releases of Green Belt land set out in Table SP11.1 are justified by proportionate evidence or by a sufficient exceptional circumstances. Exceptional circumstances presented, essentially development pressure, partly emanating from the West Midlands and along the M54 corridor, are not quantified or justified by proportionate evidence. Appears to be no need to release RAF Cosford from the Green Belt - existing policies already allow for the military-related development proposed. Certainly no need for the amount of land proposed to be released and no evidence is given o support how the actual area of land proposed has been calculated. Land required for the Midlands Air Ambulance headquarters is a separate issue from the existing RAF Cosford. Planning permission has already been granted and “very special circumstances” were accepted to exist by the Council. Concerned about proposals for Shifnal (documented under comments on draft Policy S15). Above considerations indicate that the quantum of land proposed to be released from the Green Belt, both within this proposed Plan period and as safeguarded land, should be re-examined.
A0410	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Not Specified	No	Not Specified	The Economic Growth Strategy for Shropshire (EGS) underpins draft Policy SP12, but is considered unsound (it is based on an erroneous report) and has not been subject to Sustainability Appraisal (SA). The SA of the draft Shropshire Local Plan concludes draft Policy SP12 will have no effect on the sustainability objective of reducing carbon emissions and promoting adaption and mitigation to climate change. Consider until all development becomes zero carbon, any development will make the problem worse, not better. Therefore to comply with draft Policy SP3 and achieve climate change objectives, the Council should seek to keep economic development to minimal, optimal levels, not to “strive to maximise” things. Desire to be the best seems a worthy aim, but simply fosters competition with neighbouring Local Authorities, better placed for investment. Consider draft Policy SP12 is unsound to the extent it promotes aims not supported by proportionate evidence, particularly the evidence within climate change considerations. Consider reference to Countryside should be removed from para 3.e of draft Policy SP12. For simplicity, management of development in the countryside should be controlled solely via draft Policy SP10. The SA incorrectly references draft Policy SP12 as SP10 on page 146.
A0410	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	Not Specified	No	Not Specified	Priority for land use policy should be mitigating against the effects of both the climate emergency and ecological emergency. This should be achieved through Whole Shropshire Plans rather than Whole Estate Plans. If many Estates are preparing Whole Estate Plans, they should have been considered as part of the Local Plan Review. Further, Estates like any developer, can put in planning applications tested against the policies in the Local Plan. Draft Policy SP15 does not offer any certainty as to what constitutes (1) an “Estate” or (2) “meaningful consultation”. The Council normally only adopts/endorse documents as material considerations, where they cover a substantial area and have been subject to statutory consultation. As such, draft Policy SP15 seems to not be justified by reference to other parts of the draft Shropshire Local Plan, and is superfluous. It would be better omitted.
A0410	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	No	Not Specified	General aims of draft Policy DP11 are supported, but it does not go far enough. If Shropshire is to achieve zero carbon by 2030 (its stated aim), or even by 2050 (national policy), it must begin now to require new building to be zero carbon. Government's response to the Future Homes Standard consultation has been published and confirms their resolve to tighten Building Regulations. This includes an interim standard of a 31% reduction in carbon emissions above Building Regulations from 2021. The interim standards will act as the 'regulatory floor' and would encourage the Council to tighten draft Policy DP11 to require an overall 35% on-site carbon reduction (via fabric energy efficiency standards, on-site renewables, zero/ low carbon heat), with remaining emissions being offset by contributions into a carbon offset fund, to pay for off-site carbon reduction or sequestration. The wording "strongly encouraging" could be tightened up considerably, along the lines of the London Plan, which states that "major development should be zero carbon". Para 4, by allowing reference to “open book” accounting and viability, may in practice offer a get-out clause to any and all development. Ways must be found to make zero carbon building viable.
A0410	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23	Not Specified	No	Not Specified	Para 1(g) of draft Policy SP3 promotes fabric energy efficiency retrofits of existing buildings, yet no support is given for the responsible energy retrofitting of historic and listed buildings within draft Policy DP23 (there are many such buildings in Shropshire which are poorly insulated). In meeting Climate Emergency requirements, reducing carbon emissions from existing buildings (particularly leaky historic buildings), is at least as big a challenge as ensuring new development is zero carbon. Given officers advise that over 80% of domestic housing in 2030 already exists, measures to foster the retrofit of existing property are essential if we are to chieve our collective goal. It would be beneficial to develop supplementary planning guidance setting out how homeowners could improve the energy efficiency of their own homes without detracting from their heritage significance.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0410	B007	<p>Because of the doubts about the quantum of the proposed releases from the Green Belt, the figures should be re-examined.</p> <p>Text should be added after clause 3b to state: "Green Belt land is important not only for the five purposes in NPPF 134 but also for its natural capital value. In presenting a "very special circumstances" case, applicants should be required to quantify:</p> <ul style="list-style-type: none"> <li>i) lost food production value per hectare at current productivity rates, and what that means for UK self-sufficiency;</li> <li>ii) lost carbon absorption in tonnes per hectare; and</li> <li>iii) lost biodiversity value." </li></ul>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Shropshire Council considers the approach to establishing whether 'very special circumstances' exist to justify development within the Green Belt outlined within draft Policy SP11 and the National Planning Policy Framework (NPPF) is appropriate.</p>	No
A0410	B008	<p>Draft Policy SP12 and its proposed Explanation should replace references to "the best" and "maximum" with words indicating optimum consistent with the declared climate emergency and the aim of zero carbon by 2030.</p> <p>Para 3.e of draft Policy SP12 should remove the words "and the Countryside".</p>	<p>The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.</p>	No
A0410	B009	<p>Draft Policy SP15 is unnecessary and should be deleted. If not:</p> <p>Para 1c should be updated to state "It has been subject to the same level of public consultation as is required for Neighbourhood Plans."</p> <p>A definition of what minimum size constitutes an Estate should be included in the text.</p>	<p>Noted. It is not considered that a definition of an Estate need to be specifically provided within the draft Shropshire Local Plan.</p> <p>Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal.</p> <p>Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.</p> <p>Meaningful public consultation will depend on the nature, scope and context of the Whole Estate Plan.</p>	No
A0410	B010	<p>Para 1b of draft Policy DP11 should be amended to refer to all proposals (not just for 10 or more dwellings) and to refer throughout to the latest Building regulations.</p> <p>The opening words "strongly encouraging" of Para 1d of draft Policy DP11 should be replaced with "ensuring".</p> <p>"of 1,000m2 or more floorspace or with a gross site area of 1ha or more" should be deleted from para 2 of draft Policy DP11.</p> <p>Para 4 of draft Policy DP11 should be deleted.</p>	<p>The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed</p>	No
A0410	B011	<p>Text should be added to draft Policy DP23 similar to the following:</p> <p>The Council will seek to encourage and enable the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings (including listed buildings and buildings of solid wall or traditional construction) and in conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future. Proposals will be considered against national planning policy. The policy will be supported by the Council's Sustainable Construction and Retrofitting Supplementary Planning Document."</p>	<p>Proposals for the retrofitting of energy efficiency measures and for the installation of renewable energy systems on or affecting heritage assets would be assessed against this policy as and when they come forward. The Council does not consider it necessary to encourage such proposals and as such does not propose any changes to the policy.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0410	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP24	No	No	Not Specified	Shropshire Hills AONB with its iconic landscape and geology, covers almost a quarter of Shropshire. AONBs enjoy special protections under law and planning policy. Endorse separate submissions made by the AONB partnership and by the Save Snatchfield Group.
A0410	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP26	Not Specified	No	Not Specified	Draft Policy DP26 is unsound. It lists negative impacts renewable energy could give rise to, rather than a positive strategy which maximises potential for renewable development, as required by para 151a of the National Planning Policy Framework (NPPF). Electricity usage in Shropshire is currently about 2,300 GWh per year and estimated to rise to about 4,800 GWh per year by 2030. Draft Policy DP26 is unrealistic and fails to recognize the scale of renewable energy required for decarbonisation from gas to renewable electricity. Neighbourhood Plans would not, indeed could not, produce the renewable potential required to follow the pathway to zero carbon, set in the Climate Change Act 2008, as updated. For this reason the policy is unsound. The deployable renewable energy resources in Shropshire should be identified and mapped to inform identification of areas of search, as required by para 151b of the NPPF and Planning Practice Guidance for renewable and low carbon energy. The draft Policy should encourage retro-fitting of solar PV on the roofs of existing industrial buildings, require them for all new industrial buildings and encourage other measures for development to generate renewable electricity on-site, as envisaged by para 151c of the NPPF. There should also be specific encouragement for community-led initiatives for renewable and low carbon energy as required by para 152 of the NPPF.
A0410	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP28	Not Specified	No	Not Specified	Draft Policy DP28 is not ambitious enough in aligning with the Council's declaration of a climate emergency or with carbon reduction goals. Reports looking at modal shift and vehicle mileage reductions needed to achieve net zero emissions in Bristol and by the Committee on Climate Change concluded the need for around 50% reduction in car miles and 40% reduction in van/lorry miles, driven by shifts to public transport, cycling and walking and behaviour/system change (freight consolidation, cargo/e-bikes, car clubs and mobility as a service initiatives). They also indicate Local Authorities have a key role in reducing emissions and facilitating these changes. There may be less scope for this in a largely rural county like Shropshire but the corollary of that is that development should be weighted more towards the urban centres, with the minimal amount being targeted at rural villages. Government has also produced a number of documents (may not yet have filtered through to policy) which stress ambitions for cycling and walking and support a more ambitious approach within Local Plans. The RTPI advise that to align with net zero commitments, local plans should: set ambitious requirements for trip reduction, mode share targets and 'zero carbon' outcomes; prioritise urban renewal that enables growth while reducing travel demand; maximise the potential for local living so people can meet their needs by walking and cycling; and all new development to be located and designed to generate zero transport emissions.
A0410	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3	Not Specified	No	Not Specified	The proposed housing and employment guidelines for Bridgnorth have increased during the consultation process (1,500 dwellings to 1,800 dwellings and 16ha of employment land (based on the 'balanced' employment land calculation identified within the Preferred Scale and Distribution of Development Consultation) to 28ha of employment land to 49ha of employment land). Nowhere in the draft Shropshire Local Plan or in the Bridgnorth section of the Green Belt Exceptional Circumstances Statement is there any quantified justification for this massive proposed increase in the employment land guideline, or for the departure from balance with the housing guideline. The Council now propose allocation of 1,050 houses at Tasley Garden Village, rather than the previously proposed allocation of 850 houses on the Stanmore Garden Village. It is therefore not consistent to continue to propose an employment land allocation at Stanmore, the more so because it is Green Belt. With regard to Tasley Garden Village, response to the site promoters consultation can be summarised as: -There is no proven need for the scale of the proposals, either for housing numbers or for employment land, and -Not enough account has been taken of the climate emergency. As such consider the proposed employment land guidelines for Bridgnorth are unsound, because they are not supported by proportionate evidence.
A0410	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11	Not Specified	No	Not Specified	The proposed employment guideline for Market Drayton earlier in the Local Plan Review was some 13ha (based on the 'balanced' employment land calculation identified within the Preferred Scale and Distribution of Development Consultation), this increased during the last Regulation 18 consultation (and remain as such in the draft Shropshire Local Plan) to 35ha, presumably only because land to meet that guideline is already in the pipeline, so no new allocations are proposed. No actual quantified justification has been evidenced for this large proposed increase in the employment land guideline, or for the departure from balance with the housing guideline. This means housing and employment land are not balanced locally, raising issues of sustainability, partly because of increased levels of commuting. To that extent, the employment land guideline is not justified by proportionate evidence.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0410	B012	Text should be amended in line with the suggestions made by the AONB partnership and by the Save Snatchfield Group.	Noted. Consideration of and subsequent responses to representations from other parties will be provided in association with their representations.	No
A0410	B013	The draft Shropshire Local Plan should be referred back for further consideration and consultation of draft Policy DP26.	The Council considers that the requirements of this policy are consistent with national planning policy and guidance. No change proposed.	No
A0410	B014	Draft Policy DP28 should include the following: "Major development shall incorporate or fund the provision of high quality segregated cycle routes and direct and safe pedestrian infrastructure commensurate with the scale of development and trip generation and designed in accordance with Local Transport Note 1 / 20 - Cycle Infrastructure Design. Cycling is or will become mass transit and must be treated as such."	Policy DP28 recognises that a sustainable transportation system for Shropshire must include a range of transport networks and services and present a range of travel options to individuals, households, organisations and businesses. Policy DP28 constructs the transportation system into a hierarchy to promote sustainable choices by informing and encouraging those travelling or transporting goods to choose sustainable transport options to meet their needs. Although this hierarchy includes modes of transport considered to be unsustainable, these options are still part of the transportation system and may be the best or only means by which to travel or transport goods over long distances or to access less well connected places. To address limitations to achieving modal shifts in a rural County like Shropshire the Local Plan strategy is structured around the strategic transport corridors through the County and seeks to achieve a higher level of urban development. Policy DP28 also recognises the need for more sustainable choices in looking towards the delivery of new travel and transport options and advocates the Hierarchy of Sustainable Transport as a simple decision pathway for everyone to follow in making their choices about travel and transport and by encouraging everyone to consider how they can contribute to reversing adverse changes to our environment. The need for further investment in the pedestrian and cycling networks is addressed in paragraph 4.252 which states " <i>Developer contributions to improvements in our transport networks and infrastructure will be encouraged wherever possible, to increase the capacity, function and safety of our footways, cycleways, roads, rail and public transport networks</i> ".	No
A0410	B015	The quantum of employment land proposed for Bridgnorth, including that proposed to be released from the Green Belt, needs to be reappraised.	Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. The proposed employment land guideline for Bridgnorth provides appropriate choice and competition within the market, recognises the role of Bridgnorth and its contribution towards strategic growth objectives in the east of the County and meets the needs of the town and its surrounding hinterland, including attracting inward investment and allowing existing businesses to expand. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No
A0410	B016	The quantum of employment land proposed needs to be reappraised.	Shropshire Council considers that the proposed development strategy for Market Drayton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. The proposed employment land guideline for Market Drayton provides appropriate choice and competition within the market, recognises the role of Market Drayton and its contribution towards strategic growth objectives in the north-east of the County and responds to the needs of the town and its surrounding hinterland, including providing opportunities for existing businesses to expand and opportunities associated with High Speed 2. It is noted that no additional employment land allocations are proposed for Market Drayton.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0410	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14	Not Specified	No	Not Specified	<p>The proposed employment guideline for Oswestry earlier in the Local Plan Review was some 19ha (based on the 'balanced' employment land calculation identified within the Preferred Scale and Distribution of Development Consultation), this increased during the last Regulation 18 consultation (and remain as such in the draft Shropshire Local Plan) to 57ha, presumably only because land to meet that guideline is already in the pipeline, so no new allocations are proposed. No actual quantified justification has been evidenced for this large proposed increase in the employment land guideline, or for the departure from balance with the housing guideline.</p> <p>This means housing and employment land are not balanced locally, raising issues of sustainability, partly because of increased levels of commuting. To that extent, the employment land guideline is not justified by proportionate evidence.</p> <p>Note that the housing guideline for Oswestry also increased by 100 dwellings at the same time the employment guideline increased.</p> <p>With regard to proposed allocations at Park Hall:</p> <ul style="list-style-type: none"> <li>-Para 2 of draft Policy S14.1 references Oswestry 2050 as an inspiration, this misses the point of this document which identified the need for a long term plan (including a transport plan) aiming to reduce carbon emissions and made no reference to a mixed use 'garden settlement', rather than being the Plan.</li> <li>-Proposals include provision for key worker housing for the RJAH Hospital and Derwen College, this is welcomed, but there is no mechanism to secure it.</li> <li>-Site location presents conflicts. It is an allocation for Oswestry (some distance from Oswestry), in Whittington Parish, but will benefit employment sites in Gobowen Parish.</li> </ul> <p>Allocation of resulting CIL monies may be problematic.</p> <ul style="list-style-type: none"> <li>-Note the components of the site have been subject to change from that earlier proposed.</li> <li>-Parts of these site were rejected in the SLAA but no mitigation is proposed within the Sustainability Appraisal (SA).</li> </ul> <p>As such it appears that the allocations at Park Hall are not supported by proportionate evidence, and are therefore unsound. It is unsustainable to treat allocations at Park Hall to meet the needs of Oswestry and some of the new allocations now proposed for Park Hall were rejected in the SLAA.</p>
A0410	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15	Not Specified	No	Not Specified	<p>The proposed employment guideline for Shifnal earlier in the Local Plan Review was some 16ha (based on the 'balanced' employment land calculation identified within the Preferred Scale and Distribution of Development Consultation), this increased during the Local Plan Review process to 40ha and then to 41ha (and remains as such in the draft Shropshire Local Plan), to address 'local circumstances'. Nowhere in the draft Shropshire Local Plan or in the Shifnal section of the Green Belt Exceptional Circumstances Statement is there any quantified justification for this massive proposed increase in the employment land guideline, or for the departure from balance with the housing guideline.</p> <p>The description of the employment guideline is also inconsistent, with references to 40ha and 16ha in both the draft Shropshire Local Plan and Green Belt Exceptional Circumstances Statement. The fact that employment land is developed out to 40% of the total land area was accounted for in the formula arriving at the initial guideline for Shifnal of 16ha. The Council seem to be incorrectly grossing up again at 40% for a second time in moving from the 16ha to the 40ha figure. Therefore conclude that the proposed allocation of 39ha of employment land at SHF018b &amp; SHF018d is not based on proportionate evidence, and is therefore not justified.</p> <p>By the same logic, do not consider that any need has been soundly evidenced for the release from the Green Belt of the amount of safeguarded land proposed. Note that no site references have been given for the land listed in Schedule S15.1(iii), which makes it more difficult to cross-check to other evidence documents.</p>
A0411	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3 (BRD030)	Not Specified	No	Not Specified	<p>Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. It should be noted that the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ.</p> <p>It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored.</p> <p>A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0410	B017	The quantum of employment land proposed, and the allocations at Park Hall, need to be reappraised.	<p>Shropshire Council considers that the proposed development strategy for Oswestry and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The proposed employment land guideline for Oswestry provides appropriate choice and competition within the market, recognises the role of Oswestry and its contribution towards strategic growth objectives in the north-west of the County and meets the needs of the town and its surrounding hinterland, including attracting inward investment and allowing existing businesses to expand.</p> <p>It is noted that no additional employment land allocations are proposed for Oswestry.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken. The Strategic Land Availability Assessment (SLAA) represents the first phase of this site assessment process and represents a very strategic assessment of an individual sites suitability, availability and achievability (including viability). It is not intended to be an exhaustive exercise and has not been informed by a direct assessment from officers from other relevant services areas such as development management; heritage and design; natural environment; public protection; highways; or flood risk management.</p>	No
A0410	B018	<p>The quantum of employment land proposed to be released from the Green Belt, both now and as safeguarded land, needs to be reappraised.</p> <p>Site references should be given for the land listed in Schedule S15.1(iii).</p>	<p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038.</p>	No
A0411	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0411	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030).</p> <p>At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers ‘.. will make provision for the needs of the town and surrounding hinterland...’?</p> <p>In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?</p>
A0411	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	<p>The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p> <p>The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the “sustainable urban extension” stated in the Local Plan.</p>
A0411	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth.</p> <p>However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?</p>
A0411	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site.</p> <p>Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not compatible with one another re poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18.</p> <p>It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated?</p> <p>BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0411	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0411	B003	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0411	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. Shropshire Council has undertaken an Economic Development Needs Assessment and Employment Land Review to inform the Local Plan Review. The Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Specifically with regard to employment land, this proposed strategy provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Having a supply of land which creates choice and competition in the market provides flexibility to respond to changing circumstances.</p> <p>Employment allocations are specifically allocated for employment purposes. Draft Policy SP13 indicates that allocated employment land will be protected for employment generating uses and alternative uses will only be supported in specific circumstances, as documented within the draft Policy.</p>	No
A0411	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0411	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.
A0411	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 specifies development can only occur where there is sufficient infrastructure capacity available or where the development funds necessary improvements to infrastructure through a suitable developer contribution. What contributions are required of BRD030 and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 recognises businesses and communities require quality broadband provision/mobile network connectivity and also states development proposals will be expected to provide infrastructure for broadband and mobile communications as essential utilities. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0411	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 and S3 (BRD030)	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0412	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	HNN014 and HNN016	No	No	No	Shropshire Council has failed its duty to cooperate and ignored communications including from solicitors.
A0413	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1	Yes	No	Yes	Support identification of Shrewsbury as a Strategic Centre and the primary focus for development in draft Policy S16.1. Consider Shrewsbury should be an increased focus for growth and therefore accommodate more development, given the towns role and function (highest order settlement as supported by the Sustainability Appraisal and Hierarchy of Settlements Assessment undertaken to inform the draft Shropshire Local Plan); development opportunities available; jobs, services and facilities available to the town and its hinterland; and availability of existing and proposed infrastructure (including the north west relief road). In principle support for delivery of the NWRR. But object to proposed restrictions to residential development in bullet 7 of draft Policy S16.1 and draft Policy SP10 regarding land between the proposed NWRR and the existing development boundary, this is neither effective or justified and is therefore unsound as: -Implementation of the NWRR represents a fundamental change to landscape character/visual relationship of the countryside to the town in this location. -Little logic in not supporting residential and commercial development, given commercial is supported. -No rationale/justification for not supporting residential development as sites in this location (including SHR163, SHR174, SHR109 and SHR023) perform as well as proposed allocation SHR173. Collective promotion of predominantly greenfield sites to the west of Ellesmere Road, mainly (but not entirely) covered by sites SHR163, SHR174, SHR109 and SHR023 (site plan appended to representation). The proposed North West Relief Road (NWRR) pass through this collective promotion. The site is not encumbered by physical or environmental constraints, character and accessibility of this location will change as a result of the NWRR, it is capable of supporting sustainable development contributing to meeting the needs of Shrewsbury/Shropshire and can contribute towards critical infrastructure provision identified in the settlement strategy. The site is considered suitable, available and achievable. Consider this collective promotion should be proposed for allocation.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0411	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0411	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0411	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No
A0412	B001	<p>Accept Highley Parish Council's wish to prevent development on the banks of the River Severn up to 2038, provided the proposed housing guideline is achieved.</p>	<p>Shropshire Council considers that the proposed development strategy for Highley and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>	No
A0413	B001	<p>The proposed residential development guideline for Shrewsbury should increase.</p> <p>Bullet 7 of draft Policy S16.1 should be modified to allow residential development in the areas between the development boundary and the proposed NWRR.</p> <p>Sites SHR163, SHR174, SHR109 and SHR023 should be allocated for development.</p> <p>Make associated changes to the proposed development boundary.</p>	<p>Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of the component sites of this site promotion.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0413	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Schedule S16.1 (i)	No	No	Yes	Support principle of development to the west of Shrewsbury but object to omission of the site mainly (but not entirely) covered by sites SHR163, SHR174, SHR109 and SHR023 (site plan appended to representation). The site is available, suitable and achievable for sustainable residential-led development. Characteristics and accessibility of this area will fundamentally change as a result of the North West Relief Road (NWRR). This will create a hard urban edge which should be used positively to form a new sustainable residential development area. There is no clear evidence why this area is not proposed for allocations when SHR173 is, it is equally if not more appropriate and provides the added benefit of positively addressing the NWRR. Consider the Sustainability Appraisal (SA) analysis for this and other sites are inconsistent and not comprehensive, applying different weight and emphasis to the implications and potential mitigation/management of issues such as developability, highway/traffic, ecology, air quality and noise. There has also been a failure to consider the relative importance/significance/magnitude of different SA indicators/measures and generalised assumptions about capacity/effects of development.
A0413	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Schedule S16.1 (i) (SHR173)	No	No	Yes	Do not object to principle of development of land to the west of Ellesmere Road for housing and supportive of this broad location as a sustainable part of Shrewsbury, particularly in the context of the North West Relief Road. Overall SHR173 is a sustainable site and do not object to the principle of its allocation. However, proposed allocation SHR173 is not justified and the draft Shropshire Local Plan is unsound as it is unclear how the decision to propose this site for allocation has been reached, given other available, suitable and achievable sites in this location (including collective promotion of SHR163, SHR174, SHR109 and SHR02 - site plan appended to this representation) which are equally if not more appropriate and provide the added benefit of positively addressing the NWRR. Consider the Sustainability Appraisal (SA) analysis for this and other sites are inconsistent and not comprehensive, applying different weight and emphasis to the implications and potential mitigation/management of issues such as developability, highway/traffic, ecology, air quality and noise. There has also been a failure to consider the relative importance/significance/magnitude of different SA indicators/measures and generalised assumptions about capacity/effects of development.
A0413	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	No	Yes	Support the proposed housing requirement within draft Policy SP2, which exceeds the latest calculation of local housing need, includes a 1,500 dwellings contribution to unmet need arising in the Black Country. The proposed housing requirement should be considered a minimum in accordance with para 60 of the National Planning Policy Framework (NPPF). Housing provision above the requirement is more likely to deliver sufficient housing (including affordable housing). Broadly support the spatial distribution of development, with its clear emphasis on future housing and employment development in and adjacent to Shrewsbury as the largest and most sustainable settlement in Shropshire. Concerned about proposals for strategic sites that are not particularly well connected to existing settlements (including development of Green Belt). This is not a sound strategy as it is not justified or effective given opportunities to focus on Shrewsbury, capitalising on existing and proposed infrastructure. Shrewsbury can support more development than proposed, particularly to support new infrastructure provision, including the NWRR.
A0414	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DUD006	Not Specified	No	Not Specified	Site DUDH006 is in large part a greenfield site outside the previous village development boundary and its allocation should not be saved as its inclusion is unsound: -It is not justified as it is based on inaccurate assumptions/information about ground/soil conditions (impermeable clay rather than highly permeable geology) and drainage (failure to correctly assess flood risk or consider sustainable drainage solutions. The site floods and acts as a floor water storage area - Environment Agency Map appended to the representation) which go to the heart of its suitability. -It is not effective as a result of the inaccuracies to constraints identified and the development numbers are not deliverable (due to the implications of these constraints - particularly drainage, habitats, highways and presence of sewers). -It is inconsistent with national flood policy and draft Policies DP21 and DP22 of the draft Shropshire Local Plan.
A0415	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S5.1	Yes	No	Yes	The draft Shropshire Local Plan is unsound as it is not based on robust or credible evidence. Specifically, no evidence is provided to support the proposed windfall allowance for Church Stretton and no evidence is provided that this allowance is deliverable in accordance with draft Policy S5.1. This is required in para 70 of the National Planning Policy Framework (NPPF). The proposed windfall allowance is the second highest of the 11 proposed Key Centres (as documented in Appendix 5 of the draft Shropshire Local Plan). It appears the allowance has been arrived at by simply transferring the capacity of a former allocated site to be deleted to windfall. Any allowance and consideration of its deliverability must consider known constraints (topology, flood plan and unique status entirely within the AONB with its associated constraints and objectives). In recent years the visual dominance of landscape and tree cover in the town is increasingly being replaced by build development, including significant amounts of garden infill. This is an issue recognised within various parts of the draft Shropshire Local Plan (such as draft Policy SP1 and para 5.86 of the proposed explanation to draft Policy S5.1) and the AONB Management Plan (recognised as an important consideration within draft Policy DP24 of the draft Shropshire Local Plan). Para 70 of the NPPF identifies a need to consider whether inappropriate development of residential gardens should be resisted where it would harm the local area. The AONB Management Plan also prioritises managing negative impacts resulting from change and development particularly in the Stretton Valley and considers the physical capacity for development in Church Stretton may be more limited than elsewhere and it is important that the sensitivities of the AONB are fully considered. NPPF and National Planning Practice Guidance (NPPG) echo this and recognise necessary protection may limit development/ability to meet objectively assessed need. Regretful an assessment of affordable housing need has not occurred to inform potential provision of rural exception and cross-subsidy sites (inevitably located outside the development boundary) which could contribute to achieving the guideline (if exceptional circumstances such as compelling evidence of need is justified). Note choice to use the Annex 2 of the NPPF definition of major development, although this appears contrary to footnotes 55 and 70 of the NPPF which state decision makers decide on what is major development.
A0415	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Policy Map Inset S5	Yes	No	Yes	The development boundary/inset map illustrating it are important as it defines the area considered countryside. Draft Inset Map S5 fails to include around 100 existing dwellings at Lawley Close, Willow Meadow, Leasowes Close and Street Meadow. It is inaccurate to include these within the open countryside and renders them subject to different policies.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0413	B002	Sites SHR163, SHR174, SHR109 and SHR023 should be allocated for development rather than/in addition to SHR173. Make associated changes to the proposed development boundary.	Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of the component sites of this site promotion.	No
A0413	B003	Sites SHR163, SHR174, SHR109 and SHR023 should be allocated for development rather than/in addition to SHR173. Make associated changes to the proposed development boundary.	Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of the component sites of this site promotion.	No
A0413	B004	The draft Shropshire Local Plan should be amended to direct more development towards Shrewsbury and allocate more land in and around the town. This should include sites SHR163, SHR174, SHR109 and SHR023.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.	No
A0414	B001	DUDH006 should be either excluded or its suitability re-assessed to consider issues of flooding/drainage, sustainable drainage solutions and development capacity.	Shropshire Council considers that the proposed development strategy for Dudleston Heath and the existing commitments (including the existing allocation), and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities. Proposed saved SAMDev Allocations have previously been the subject of assessment and examination.	No
A0415	B001	A summary of the evidence demonstrating that the proposed windfall allowance for Church Stretton is realistically achievable should be included in the draft Shropshire Local Plan. A revised windfall allowance should be provided for Church Stretton.	Shropshire Council considers that the proposed development strategy for Church Stretton and the existing commitments (including the existing allocations) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities, including its location within the Shropshire Hills AONB. With regard to demand for affordable housing, Shropshire Council would highlight that there are currently 88 households on the HomePoint housing waiting list which have identified a first preference to live in Church Stretton, of which 78 have indicated at least one local connection to the town (a breakdown of the bedroom number requirements for these is as follows: 37 x 1 bed; 26 x 2 bed; 14 x 3 bed; and 1 x 4 bed). We would also note that Church Stretton Town Council have recently undertaken a housing survey for Church Stretton town, which was supported by Shropshire Council.	No
A0415	B002	Update the draft development boundary for Church Stretton.	Noted. Shropshire Council considers that the proposed development boundary for Church Stretton is appropriate. Generally we exclude affordable housing exception sites such as those referenced from development boundaries.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0415	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 5.85	Yes	No	Yes	Para 5.85 of the proposed explanation to draft Policy S5.1 sets out the special qualities of the Church Stretton area. Failure to mention Caer Caradoc hillfort amongst scheduled monuments is a gross error, especially given its iconic status/historic interest.
A0416	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	No	Not Specified	The draft Shropshire Local Plan ignores the status and policies of the Much Wenlock Neighbourhood Plan (MWNP). The proposed allocation MUW012VAR is developer led and too large for the town. No meaningful engagement has occurred within the local community to understand their multiple concerns has occurred. Shropshire Council has ignored its legal duty regarding flood risk management by entrusting such matters to the developer. Consider developer led infrastructure solutions are often inadequate and Hunters Gate (adjacent to MUW012VAR), which still experiences flooding issues, is a good example of this. Concerned increased run-off associated with increased urbanisation will increase risk to existing properties, particularly those associated with Farley Brook the only watercourse to the River Severn from Much Wenlock and its environs.
A0417	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	ALV009	Not Specified	No	Not Specified	Alveley has accepted appropriate development over recent years, including affordable housing in the Green Belt and a cross-subsidy scheme. A large residential caravan/park home site is also currently being developed just outside Alveley. A recent local housing need survey identified need for affordable houses/bungalows and some open market dwellings. Consider existing policy mechanisms have worked well. Would welcome removal of proposed allocation ALV009 and adjustment of the proposed residential guideline to reflect increased development that has occurred since the Local Plan Review commenced. Post office provision is now limited and there is no weighting adjustment for changes to services.
A0418	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S20 IRN001	No	No	Yes	Recognise the Former Ironbridge Power Station site needs to be redeveloped to mitigate impacts of its previous use. However, disagree that the adjacent greenfield land should be included within the proposed allocations given the impact of its development on highways/surrounding communities and the wider development capacity identified within the draft Shropshire Local Plan. Development of this site alongside proposals for Much Wenlock (MUW012VAR) and Cressage (CES005) will more than double the population of the Much Wenlock Place Plan Area (within a concentrated part of it), placing a disproportionate burden on Much Wenlock town and does not constitute balanced growth (housing, employment and infrastructure balanced which is a clear aspiration of the Much Wenlock Place Plan). Significant concern about ability/capacity of road infrastructure to support redevelopment of the Former Ironbridge Power Station (road infrastructure already a concern noted in the Much Wenlock Place Plan), particularly the junction of B4380/A4169 where it crosses the River Severn adjacent to the site (steep and dangerous); junction of A4169/A458 (Gaskell corner) in Much Wenlock (which is heavily congested, dangerous for pedestrians and often leads to rat running on narrow streets some without footways and further congestion); the A4169 and A458 themselves (steep, heavily used particularly at peak times and when other roads are flooded, used by HGV's, limited visibility for vehicles turning onto side road/drives and safety concerns for pedestrians (particularly because footways are not continuous) and vehicles etc). Linked to this is concerns of wider rat-running, noise, vibration and emissions. Walking and cycling from the site to Much Wenlock is unlikely due to the above issues, increasing congestion. This needs very careful assessment and measures devised which ensure safety/health of those living along onward routes.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0415	B003	Relevant sentence of para 5.85 should be amended to read There are Scheduled Monuments at Nover's Hill to the north, Caer Caradoc to the north-east and Brockhurst to the south.	Noted. Para 5.85 of the proposed explanation to draft Policy S5.1 is providing general context for Church Stretton rather than seeking to listing all assets and/or constraints the exist. The two Scheduled Monuments identified are simply the two closest to the built form of the town. No change proposed.	No
A0416	B001	Review and restructure the draft Shropshire Local Plan to take account of the Much Wenlock Neighbourhood Plan (MWNP), informed by engagement with the local community. Consider impact of the proposed development of the Former Ironbridge Power Station on Much Wenlock. Comprehensively review flood risk mitigation measures required within the town and Farley. Infrastructure must address existing issues and support development of the town within the parameters of the MWNP.	Noted. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement. Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans.	No
A0417	B001	Remove proposed allocation ALV009. Adjust the proposed residential guideline for Alveley to reflect recent commitments and allow the community time to absorb growth in the Parish (particularly Alveley). Provide explanation of how greater access to the Green Belt can be achieved for the community to off-set proposed development.	Noted. Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable and deliverable. The Draft Plan strategy has focused development in principal and key centres, but Green Belt release, to provide for allocations, are identified for Alveley to support its continuing role as a Community Hub as detailed within the exceptional circumstances statement. Allocation of sites in different parts of the village provides alternative delivery options. Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. Existing commitments and development in Alveley during the Plan period (2016-2038) are taken into account and contribute to the housing guideline figure. The exceptional circumstances statement details potential compensatory improvements to the Green Belt, including opportunities to for improving access.	No
A0418	B001	Include a realistic approach to highway impacts.	Noted. Shropshire Council considers that the proposed development strategy for the proposed Former Ironbridge Power Station Strategic Settlement is appropriate, effective, sustainable and deliverable. Proposed site guidelines for the proposed Former Ironbridge Power Station Strategic Settlement include a requirement to undertaken "any necessary improvements to the local and strategic road network...", this would be informed by an appropriate Transport Assessment at the Planning Application stage (site is currently subject to a Planning Application and it is understood a Transport Assessment has been undertaken in support of this application).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0418	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Statement of Community Involvement	No	No	Yes	Concerned about the consultation process, especially that at Regulation 19, undertaken to inform the draft Shropshire Local Plan. The process is very complicated which leads the general public at a marked disadvantage; there has been insufficient publicity; local views have not been reflected; Covid restrictions have meant opportunities to view paper copies of documents have largely been lost; the extension to the Regulation 19 consultation period was decided at the end of the original period, frustrating efforts to communicate it; and consultation documents are laid out and scaled (text size) in a way that it is difficult to assimilate at A4 and few households have A3 printers (particularly the site assessments which were approx. font size 5-6 at A4 when a minimum of font size 12 is recommended and there was an absence of repeater headers).
A0418	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13 (MUW012VAR)	No	No	Yes	<p>Object to proposed allocation MUW012VAR.</p> <p>Development of MUW012VAR alongside proposals for the Former Ironbridge Power Station and at Cressage (CES005) will more than double the population of the Much Wenlock Place Plan Area (within a concentrated part of it), placing a disproportionate burden on Much Wenlock town and does not constitute balanced growth (housing, employment and infrastructure balanced which is a clear aspiration of the Much Wenlock Place Plan).</p> <p>There is no guarantee that MUW012VAR would provide:</p> <ul style="list-style-type: none"> <li>-A range of house sizes and tenures to meet local needs (including how much affordable housing and whether this is reserved for those with local connections to Much Wenlock, as required within the Much Wenlock Neighbourhood Plan (MWNP));</li> <li>-Public open space and recreation facilities, especially for young people.</li> <li>-Flood attenuation measures that alleviate flooding at the Hunters Gate Estate. They will not alleviate flooding throughout the town/along Farley River. Also, Government has committed to substantial investment in flood defences by 2027, concerned MUW012VAR may be used as a reason not to invest in Much Wenlock.</li> </ul> <p>Water supply and sewerage is insufficient for existing demand, without significant investment it will not be able to cater for MUW012VAR.</p> <p>Due to distance of MUW012VAR from the retail core, people will not walk. Once in the car opportunities for more comprehensive offers are available in Shrewsbury/Telford/Bridgnorth/Madeley etc. As such, economic benefits for the town's traders, businesses and workforce will be limited.</p> <p>MUW012VAR is not in alignment with policies and aspirations of the MWNP. Shropshire Council acknowledge that the aspirations of the MWNP are currently being fulfilled (strong likelihood that two brownfield sites (MUW001 and MUW002) will come forward with capacity for at least 28 dwellings).</p> <p>Road infrastructure in and around Much Wenlock is fragile, development of MUW012VAR (in combination with the Former Ironbridge Power Station and at Cressage (CES005)) will detrimentally impact on road users (including pedestrians, cyclists and commuters), particularly at pinch points like the junction of the A458 and A4169 and Gaskell junction. It will also increase noise, emissions and congestion.</p> <p>Medical facilities in Much Wenlock and Cressage are already at capacity.</p> <p>Education facilities will over time expand to accommodate pupils from the Former Ironbridge Power Station, but no account is made to development in Much Wenlock and Cressage.</p> <p>Consider windfall sites (including the aforementioned brownfield sites) would achieve the original proposed settlement residential guideline of 150 dwellings. Current proposed may mean development well exceeds the proposed residential guideline (300 rather than 200 dwellings)</p>
A0419	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18	Yes	Yes	Yes	Pleased to see draft Policy DP18 includes consideration of unstable land and identifies that appropriate information will be required to support development proposals where land instability poses a potential risk.
A0419	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP16 and Figure SP16.1	Yes	Yes	Yes	Inclusion of draft Policy SP16 and the associated Mineral Safeguarding Areas is noted.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0418	B002	<p>Better publicise consultations.</p> <p>Undertake a consultation meeting relating to the increased scale of the proposed allocation in Much Wenlock (similar engagement to the initial allocation).</p> <p>Allow a longer consultation period, post Covid lockdown.</p> <p>Provide simpler and more easily-read consultation documents.</p>	<p>Noted. Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and national legislation. It is recognised that consultation material is extensive and can be complex and every endeavour is made to present this as succinctly and straightforwardly as possible, however it must be recognised that the planning policy process is complex and includes numerous very technical issues.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation. Responses to each of these stages of consultation have been given due consideration and informed proposals within subsequent stages of consultation, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No
A0418	B003	<p>Remove proposed allocation MUW012VAR and instead include the brownfield sites MUW001 and MUW002.</p>	<p>Noted. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement.</p> <p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans.</p>	No
A0419	B001	N/A	Noted.	No
A0419	B002	N/A	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0420	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.1 MUW012VAR	No	No	No	<p>Selection of proposed allocation MUW012VAR ignores the status and policies of the Much Wenlock Neighbourhood Plan (MWNP) simply because the draft Shropshire Local Plan runs to 2038 and the MWNP runs to 2026. This selection also ignores community wishes and occurred before community consultation. MUW012VAR was selected to meet housing numbers, irrespective of strategic issues such as transport/traffic and flood management, particularly in relation to the potential effect of the Ironbridge Power Station development in Buildwas Parish which lies in the Much Wenlock Place Plan area. Shropshire Council has ignored its legal duties as a risk management authority in relation to flooding, despite past representations from the public. They are reliant on the developer of MUW012VAR carrying out all necessary flood management tasks satisfactorily and have ignored other higher-rated (good rather than fair) sites in the town with no flooding issues.</p>
A0421	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18	Not Specified	No	Not Specified	<p>Oppose proposed housing allocations in Whitchurch, as more appropriate and sustainable alternative sites (such as WHT035) exist. WHT035 is suitable, available and viable. It has clearly defined boundaries, has no overriding constraints to development and benefits from direct access onto Tarporley Road, and can help deliver the housing needs of Whitchurch and would represent sustainable development. Consider suitability of WHT035 has been overlooked and the strategic land availability assessment (SLAA) and wider site assessment process is flawed. The site assessment concludes WHT035 is divorced from the town, but this is incorrect as it is adjacent to the well-established Grove development, would represent a natural extension of the town and is in proximity of current and proposed allocations. Given this, it is clearly a sustainable location, benefits from direct and convenient access to services and facilities in the town centre and would help promote use of sustainable modes of transport. Indeed, its sustainability is confirmed within the Sustainability Appraisal (SA) of the draft Shropshire Local Plan which rates the site 'fair', with a better score than proposed allocations on Chester Road. Note a local Cllr has raised significant infrastructure concerns in relation to proposed allocations WHT037 and WHT044. Given these concerns, clear there are underlying issue which have not been properly considered in relation to proposed allocations. WHT044 was also rejected in the SLAA due to poor relationship to the existing built form/separation from the development boundary and WHT037 is dependent on WHT044 for access. Note this is a joint allocation, but it is difficult to see how this improves suitability given each sites failings. WHT042 is landlocked and requires the adjacent allocation to be developed first, before it can be considered available and its deliverability is questionable. As such consider the draft Shropshire Local Plan is unsound.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0420	B001	<p>Treat Much Wenlock in the same way as other Neighbourhood Plan towns.</p> <p>Prepare an infrastructure investment strategy (particularly highways) to support the proposed 15% increase to the size of the town.</p> <p>Properly assess alternative sites.</p> <p>Specify how traffic problems on A458, A4169 and the medieval streets of Much Wenlock will be addressed.</p> <p>Explain why cross-boundary need from the Black Country is being accommodated in Shropshire.</p> <p>Recognised the effect of wider development in the Much Wenlock Place Plan area (including the Former Ironbridge Power Station) on Much Wenlock town.</p>	<p>Noted. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement.</p> <p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans.</p>	No
A0421	B001	Allocate site WHT035 for residential development.	<p>Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0422	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18	Not Specified	No	Not Specified	<p>Consider the proposed housing allocations in Whitchurch are inappropriate, do not represent the most suitable or sustainable options for Whitchurch and are unsound. As such, the draft Shropshire Local Plan does not meet the principles/requirements of draft Policy SP1 or the principles of sustainable development prescribed by the National Planning Policy Framework (NPPF) and is unsound.</p> <p>Also consider there is a lack of consistency in the Council's approach to assessing suitability of the sites and identifying proposed allocations and the site assessment process is poor and vague. For example:</p> <ul style="list-style-type: none"> <li>-Consideration of landscape/visual impact provides no explanation of the assessment, reaches inconsistent conclusions for sites and includes no recognition of site boundaries.</li> <li>-WHT042 is landlocked and requires the adjacent allocation to be developed first, before it can be considered available and its deliverability is questionable. It is also in close proximity of Staggs Brock Wildlife site and in flood zones 2/3 - it is difficult to see how the Council have determined these issues can be mitigated, particularly as a similar approach is not take within WHT017VAR.</li> <li>-A local Cllr has raised significant infrastructure concerns in relation to proposed allocations WHT037 and WHT044. Given these concerns, clear there are underlying issue which have not been properly considered in relation to proposed allocations. WHT044 was also rejected in the SLAA due to poor relationship to the existing built form/separation from the development boundary and WHT037 is dependent on WHT044 for access. Note this is a joint allocation, but it is difficult to see how this improves suitability given each sites failings. WHT037 and WHT044 is proposed for allocation despite the need for further highway assessment and part of the justification is a link between Chester Road and Tarporley Road, which is considered unnecessary as both routes are directly into town. This brings into question wider reasoning.</li> </ul> <p>Site WHT017VAR is appropriate, suitable, available, viable and developable. It benefits from good access to services and facilities and the town centre, an appropriate access can be established, flood risk (identified as a concern within the site assessment process) is assessed and can be appropriately managed (access and sustainability appraisal and flood risk assessment for the site is appended to the representation), and it provides an opportunity to expand and restore the environmental network and has clearly defined boundaries. It represents a more sustainable and suitable housing allocation to meet the needs of Whitchurch than proposed allocations.</p> <p>The Sustainability Appraisal (SA) of WHT017VAR is incorrect scores for presence of tree preservation orders; access to a leisure centre and natural green space; presence of grade 1/2/3 agricultural land; and being in flood zones 2/3. The SA fails to consider access to essential goods and local shops. With these scores corrected it is a more sustainable site than the proposed allocations. WHT017VAR also scores comparably with the proposed allocations within the highway accessibility ratings. As such it is considered clearly a better and more sustainable housing option.</p> <p>Consider the proposed windfall allowance for Whitchurch is too high and there is no guarantee it will be delivered. This could be reduced by allocating WHT017VAR.</p>
A0423	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Not Specified	Not Specified	Not Specified	<p>Duty to Cooperate: West Midlands Resource Technical Advisory Body (WMRTAB) has facilitated discussion between Shropshire Council and other neighbouring waste planning authorities to assist with meeting the Duty to Cooperate in relation to waste management. Para 4.279 of the draft Shropshire Local Plan reports Shropshire is dependent on waste management services in neighbouring local authorities, particularly Telford and Wrekin. Note that National Planning Practice Guidance (NPPG) recognises "there is no expectation that each local planning authority should deal solely with its own waste to meet the requirements of the self-sufficiency and proximity principles...". Consider Statement(s) of Common Ground (SoCG) relating to meeting Shropshire's needs for waste management in other areas may be required, although understand a SoCG between Shropshire Council and Telford and Wrekin is in place.</p> <p>Soundness - Consistency with National Policy for Waste: The draft Shropshire Local Plan appears consistent with National Policy for Waste, although there are areas this could be clearer:</p> <ul style="list-style-type: none"> <li>-Promoting of the provision of adequate waste storage and segregation facilities within new residential and commercial development. Although note the draft Shropshire Local Plan supports sustainable waste management for new development in its requirement for "all types of development to include information about the management of waste during their construction and subsequent operation";</li> <li>-Requirements for additional wastewater treatment capacity. However, the draft Shropshire Local Plan does recognise the need for such additional capacity to facilitate development in certain areas; and,</li> <li>-Future monitoring of municipal waste recycling, recovery and disposal.</li> </ul>
A0424	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	BKL008a	Not Specified	No	Not Specified	<p>BKL008a adjoins the South Shropshire Hills AONB and is outside the village envelop. Its development would have a detrimental visual impact and harm residential amenity, which are key considerations.</p> <p>Protection of the environment is a key aspiration for the local community as evidenced within the latest Parish Plan and responses to Parish Surveys.</p> <p>The views of local residents have been ignored.</p> <p>Population increase in Bucknell resulting from SAMDev Plan proposals will significantly change village character (graph of population/household growth appended to representation), this will be exacerbated by BKL008a, a further example of over development. Level of growth proposed in a short period cannot be absorbed by the settlement.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0422	B001	<p>Re-assess potential housing allocations in Whitchurch.  Revisit the sustainability criteria utilised.  Allocate site WHT017VAR for residential development.</p>	<p>Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity. Shropshire Council also considers that the Sustainability Appraisal (SA) of the draft Shropshire Local Plan is appropriate and robust.</p>	No
A0423	B001	<p>The draft Shropshire Local Plan could be clearer regarding:  -Promoting of the provision of adequate waste storage and segregation facilities within new residential and commercial development;  -Requirements for additional wastewater treatment capacity; and  -Future monitoring of municipal waste recycling, recovery and disposal.</p>	<p>Noted.  Draft Policy SP17 includes a requirement that "applications for all types of development to include information about the management of waste during their construction and subsequent operation".  Draft Policy DP19 includes a requirement that proposals are required to demonstrate that "they will be served by adequate water infrastructure in terms of water supply, foul drainage, wastewater and sewage treatment, without leading to significant problems for existing users or contamination of waterways (rivers or streams), clean water supply, surface water or groundwater.  One of the monitoring indicators proposed for draft Policy SP17 within the draft Shropshire Local Plan is Municipal waste management annual performance.</p>	No
A0424	B001	<p>Do not allocate BKL008a and reduce the proposed residential guideline for Bucknell.</p>	<p>Bucknell is appropriately designated as a Community Hub on the size of the settlement and the services and facilities it provides. Shropshire Council considers that the proposed development strategy for Bucknell and the existing and proposed allocations which contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Proposed site allocations have been informed by a proportionate and robust site assessment process. The settlement strategy for Bucknell, which is clearly explained in the Draft Local Plan, was consistently presented in consultations during its preparation. New housing allocation BKL008a for 20 dwellings was identified in the Preferred Sites consultation in 2018 and presented in subsequent consultations. Site BKL008a will supplement the saved SAMDev brownfield housing and employment allocation at BUCK001/BKL011 which already forms part of the housing land supply in Bucknell. The Council considered local representations recommending a further extension to BUCK001 but this site was extended to 70 dwellings in the SAMDev Plan and a further extension may affect its viability in the village of Bucknell. Further site options in Bucknell are influenced by the Area of Outstanding Natural Beauty and the Bucknell Conservation Area that cover the centre and west of the village. Site BKL008a on the east of the village lies beyond these two protective designations and provides an appropriate location for further modest housing development to meet a revised housing requirement for 110 dwellings which represents a modest increase from the previous figure of 100 dwellings. The delivery of BUCK001 and BKL008a is currently affected by the protection of the River Clun Special Area of Conservation (SAC) due to the water quality in the river. Site BKL008a could be delivered quickly as a smaller, greenfield allocation to refresh the housing market when the issues connected with the protection of the SAC are resolved but currently these issues will defer the delivery of new housing in Bucknell.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0424	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 5.37	Not Specified	No	Not Specified	Para 5.37 of the draft Shropshire Local Plan specifies a need to continue to support the sustainable growth of Bucknell. Consider the residential guidelines proposed are too high and sustainable growth is an oxymoron - plans for growth in Bucknell are not sustainable as they run counter to the Climate Emergency declared by Shropshire Council.
A0425	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	Draft Policy SP2 seeks to align growth in rural areas with the ability of village to provide a suitable standard of services. Shropshire Council stated it would apply a consistent methodology for identification of Community Hubs, through its Hierarchy of Settlements Assessment (HoS). However the Community Hubs identified in draft Policy SP2 are not based on up to date, accurate or appropriate evidence and are not justified. Two amenities (Clive Village Store and Clive Hall bowling green) still feature in the HoS score for Clive, despite no longer existing. Without these two amenities, Clive does not meet the criteria for Community Hub designation, and as such should not be identified as a proposed Community Hub in Schedule SP2.2. The draft Shropshire Local Plan is not effective and unsound.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0424	B002	Reduce the proposed residential guideline for Bucknell.	Bucknell is appropriately designated as a Community Hub on the size of the settlement and the services and facilities it provides. Shropshire Council considers that the proposed development strategy for Bucknell and the existing and proposed allocations which contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Proposed site allocations have been informed by a proportionate and robust site assessment process. The settlement strategy for Bucknell, which is clearly explained in the Draft Local Plan, was consistently presented in consultations during its preparation. New housing allocation BKL008a for 20 dwellings was identified in the Preferred Sites consultation in 2018 and presented in subsequent consultations. Site BKL008a will supplement the saved SAMDev brownfield housing and employment allocation at BUCK001/BKL011 which already forms part of the housing land supply in Bucknell. The Council considered local representations recommending a further extension to BUCK001 but this site was extended to 70 dwellings in the SAMDev Plan and a further extension may affect its viability in the village of Bucknell. Further site options in Bucknell are influenced by the Area of Outstanding Natural Beauty and the Bucknell Conservation Area that cover the centre and west of the village. Site BKL008a on the east of the village lies beyond these two protective designations and provides an appropriate location for further modest housing development to meet a revised housing requirement for 110 dwellings which represents a modest increase from the previous figure of 100 dwellings. The delivery of BUCK001 and BKL008a is currently affected by the protection of the River Clun Special Area of Conservation (SAC) due to the water quality in the river. Site BKL008a could be delivered quickly as a smaller, greenfield allocation to refresh the housing market when the issues connected with the protection of the SAC are resolved but currently these issues will defer the delivery of new housing in Bucknell.	No
A0425	B001	Clive settlement should not be identified as a Community Hub in Schedule SP2.2 of draft Policy SP2.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0425	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	<p>The Hierarchy of Settlements Assessment (HoS) has been used to identify proposed Community Hubs. Shropshire Council considers the methodology within this assessment has been consistently applied and recognises the need to keep this assessment under review. However consultation has identified inaccuracies but rather than addressing them, they have been deferred. As the HoS is not based on up to date, accurate or appropriate evidence and therefore draft Policy SP8 is not justified and considered unsound. Specifically, two amenities (Clive Village Store and Clive Hall bowling green) still feature in the HoS score for Clive, despite no longer existing. Shropshire Council recognise that the bowling green no longer exists as it does not feature within the Shropshire Council adopted Playing Pitch and Outdoor Sports Strategy Assessment (PPOSSA) 2020. Despite this its retention in the HoS is justified because of its inclusion in the Council's Open Space Needs Assessment 2017 (superseded by the PPOSSA).</p> <p>Shropshire Council has also acknowledged it has received correspondence from both the Parish Council and shop owner (during Regulation 18 consultation) that the shop is no longer in use and a Planning Application to change the use to a residential annex (change of use planning application from the owner to provide a residential annex for this former shop (ref 21/00048/FUL) has been submitted. This closure is more recent than loss of services at Westbury and Myddle but they simply notified Shropshire Council and the HoS and list of proposed Community Hubs within the relevant draft document was corrected, unclear why a different approach is taken for Clive.</p> <p>Without these two amenities, Clive does not meet the criteria for Community Hub designation, and as such should not be identified as a proposed Community Hub.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0425	B002	Draft Policy SP8 should remove reference to Clive as a Community Hub.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0425	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2	Not Specified	No	Not Specified	<p>As overarching draft Policies SP2 and SP8 that guide draft Policy S17.2 are unsound, it too is rendered unsound.</p> <p>Draft Policy S17.2 is based on inaccurate and out of date evidence on settlement sustainability within the Hierarchy of Settlements Assessment (HoS). In addition, there has been inconsistent consideration and treatment about presence of local facilities and changing circumstances.</p> <p>Specifically, two amenities (Clive Village Store and Clive Hall bowling green) still feature in the HoS score for Clive, despite no longer existing.</p> <p>Shropshire Council recognise that the bowling green no longer exists as it does not feature within the Shropshire Council adopted Playing Pitch and Outdoor Sports Strategy Assessment (PPOSSA) 2020. Despite this its retention in the HoS is justified because of its inclusion in the Council's Open Space Needs Assessment 2017 (superseded by the PPOSSA).</p> <p>Shropshire Council has also acknowledged it has received correspondence from both the Parish Council and shop owner (during Regulation 18 consultation) that the shop is no longer in use and a Planning Application to change the use to a residential annex (change of use planning application from the owner to provide a residential annex for this former shop (ref 21/00048/FUL) has been submitted. This closure is more recent than loss of services at Westbury and Myddle but they simply notified Shropshire Council and the HoS and list of proposed Community Hubs within the relevant draft document was corrected, unclear why a different approach is taken for Clive.</p> <p>Without these two amenities, Clive does not meet the criteria for Community Hub designation, and as such should not be identified as a proposed Community Hub and its inclusion as such within draft Policy S17.2 is not justified.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0425	B003	Draft Policy S17.2 should remove Clive from the list of Community Hubs.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0426	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>Draft Policy SP2 seeks to align growth in rural areas with the ability of village to provide a suitable standard of services. Shropshire Council stated it would apply a consistent methodology for identification of Community Hubs, through its Hierarchy of Settlements Assessment (HoS). However the Community Hubs identified in draft Policy SP2 are not based on up to date, accurate or appropriate evidence and are not justified. Two amenities (Clive Village Store and Clive Hall bowling green) still feature in the HoS score for Clive, despite no longer existing. Without these two amenities, Clive does not meet the criteria for Community Hub designation, and as such should not be identified as a proposed Community Hub in Schedule SP2.2. The draft Shropshire Local Plan is not effective and unsound.</p>
A0426	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	<p>The Hierarchy of Settlements Assessment (HoS) has been used to identify proposed Community Hubs. Shropshire Council considers the methodology within this assessment has been consistently applied and recognises the need to keep this assessment under review. However consultation has identified inaccuracies but rather than addressing them, they have been deferred. As the HoS is not based on up to date, accurate or appropriate evidence and therefore draft Policy SP8 is not justified and considered unsound. Specifically, two amenities (Clive Village Store and Clive Hall bowling green) still feature in the HoS score for Clive, despite no longer existing. Shropshire Council recognise that the bowling green no longer exists as it does not feature within the Shropshire Council adopted Playing Pitch and Outdoor Sports Strategy Assessment (PPOSSA) 2020. Despite this its retention in the HoS is justified because of its inclusion in the Council's Open Space Needs Assessment 2017 (superseded by the PPOSSA). Shropshire Council has also acknowledged it has received correspondence from both the Parish Council and shop owner (during Regulation 18 consultation) that the shop is no longer in use and a Planning Application to change the use to a residential annex (change of use planning application from the owner to provide a residential annex for this former shop (ref 21/00048/FUL) has been submitted. This closure is more recent than loss of services at Westbury and Myddle but they simply notified Shropshire Council and the HoS and list of proposed Community Hubs within the relevant draft document was corrected, unclear why a different approach is taken for Clive. Without these two amenities, Clive does not meet the criteria for Community Hub designation, and as such should not be identified as a proposed Community Hub.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0426	B001	Clive settlement should not be identified as a Community Hub in Schedule SP2.2 of draft Policy SP2.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0426	B002	Draft Policy SP8 should remove reference to Clive as a Community Hub.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0426	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2	Not Specified	No	Not Specified	<p>As overarching draft Policies SP2 and SP8 that guide draft Policy S17.2 are unsound, it too is rendered unsound.</p> <p>Draft Policy S17.2 is based on inaccurate and out of date evidence on settlement sustainability within the Hierarchy of Settlements Assessment (HoS). In addition, there has been inconsistent consideration and treatment about presence of local facilities and changing circumstances.</p> <p>Specifically, two amenities (Clive Village Store and Clive Hall bowling green) still feature in the HoS score for Clive, despite no longer existing.</p> <p>Shropshire Council recognise that the bowling green no longer exists as it does not feature within the Shropshire Council adopted Playing Pitch and Outdoor Sports Strategy Assessment (PPOSSA) 2020. Despite this its retention in the HoS is justified because of its inclusion in the Council's Open Space Needs Assessment 2017 (superseded by the PPOSSA).</p> <p>Shropshire Council has also acknowledged it has received correspondence from both the Parish Council and shop owner (during Regulation 18 consultation) that the shop is no longer in use and a Planning Application to change the use to a residential annex (change of use planning application from the owner to provide a residential annex for this former shop (ref 21/00048/FUL) has been submitted. This closure is more recent than loss of services at Westbury and Myddle but they simply notified Shropshire Council and the HoS and list of proposed Community Hubs within the relevant draft document was corrected, unclear why a different approach is taken for Clive.</p> <p>Without these two amenities, Clive does not meet the criteria for Community Hub designation, and as such should not be identified as a proposed Community Hub and its inclusion as such within draft Policy S17.2 is not justified.</p>
A0427	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0427	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0426	B003	Draft Policy S17.2 should remove Clive from the list of Community Hubs.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0427	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0427	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0427	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002/P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0427	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002/P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0427	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3	Not Specified	No	Not Specified	The plan is not effective as there is no evidence that it is deliverable over the plan period - particularly in relation to the planned level of development in the Bridgnorth area. The level of residential development proposed in Bridgnorth far exceeds previous delivery rates. Proposals equate to 92 dwellings per annum as at 31st March 2019 (and there has been little delivery since then, meaning the actual rate required now is higher), whereas the average for the 10-year period to 2016 was some 72.8 dwellings per annum. This means proposals are at least 26% higher than past delivery rate.) There is also no evidence that there is market capacity in Bridgnorth to sustainably absorb this level of development, particularly in competition with other settlements. The level of employment development proposed is unclear. Policy S3.1 states 49ha will be made available to "create choice and competition in the market" (this includes 13.3ha net developable on existing allocations, part of which is for the relocation of the livestock market, 11.4ha in the Green Belt adjoining Stanmore Industrial Estate and 16ha within the proposed Tasley Garden Village). However Schedule A6 gives a figure of 37.7ha as the employment land supply for Bridgnorth, this compromises 9.1% of the total supply for Shropshire. Whilst residential proposed consist of only 5.8% of the housing supply for Shropshire. The average completion rate for the 11-year period to 2017 was 0.6ha, the Shropshire Authority Monitoring Report (2017/18) states "It is anticipated that Bridgnorth and Shifnal could both perform stronger roles in the delivery of employment development to meet demands for economic growth arising in part from the rate of housing development in these settlements but this is currently constrained by the limited availability of land for employment development", however no evidence has been provided that Bridgnorth is an attractive location for new employment development and concerned whether this is realistic given weak connectivity. No infrastructure plan has been prepared and a strategic transport assessment for the Bridgnorth area has not yet been carried out/reported. Without these, it cannot be evidenced that local infrastructure is adequate or that necessary improvements can be made/funded through infrastructure contributions to support sustainable delivery of the development proposals. The Shropshire Viability Study suggests that the proposed allocation Tasley Garden Village (BRD030) and Stanmore Garden Village may be viable, however the study notes "the Council is still working up the assessment of the strategic infrastructure and mitigation requirements for these sites" and gives a "best estimate" of infrastructure contributions. As such, consider the evidential value of the Viability Study in supporting the deliverability of these sites is low in the absence of an infrastructure plan and (in particular) a strategic transport assessment for the Bridgnorth area. With regard to proposed employment allocations, the Shropshire Viability Study does not separately assess the viability of employment development at Stanmore or Tasley. In reality, the employment elements of the Tasley and Stanmore Garden Village schemes are part of mixed use allocations, whilst the proposed extension to Stanmore Industrial Estate capitalises on existing on-site infrastructure. The Shropshire Viability Study indicates Office and Industrial development is generally considered unviable and larger industrial development is only marginally viable on greenfield sites. Other forms of development appear to be viable on greenfield and brownfield sites, but these are not proposed on the new employment allocations.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0427	B003	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself.</p> <p>The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable.</p> <p>The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page.</p> <p>Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.</p>	No
A0427	B004	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market.</p> <p>Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.</p>	No
A0427	B005	<p>Provide evidence of deliverability of the scale of development proposed for Bridgnorth, this should include:</p> <ol style="list-style-type: none"> <li>1. Evidence of the market capacity to absorb the housing and employment development proposed, which significantly exceeds past rates.</li> <li>2. Evidence of the ability of local infrastructure across the Bridgnorth area (such as transport and movement) to support the scale of development and prepare an appropriate infrastructure investment plan, with sources of funding clearly identified.</li> <li>3. Provide a detailed statement of what infrastructure contributions are required from the proposed Garden Village.</li> <li>4. Re-visit viability calculations for the Garden Village developments, so they clearly include both housing and employment elements and provide a statement of what planning obligations would be expected to ensure delivery of employment alongside policy compliant housing.</li> </ol> <p>Or reduce the scale of development to nearer those historically established levels and review/identify infrastructure (including transport) required to support revised proposals.</p> <p>Identify the actual level of overall new employment development proposed for the Bridgnorth.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Draft Policy S3.1 Development Strategy: Bridgnorth Principal Centre provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.</p> <p>Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements or identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for a site.</p> <p>As part of the Local Plan Review process, Shropshire Council has engaged with key infrastructure providers and prepared/considered evidence on infrastructure capacity and needs as appropriate to inform proposed policies, including development strategies for specific settlements, and proposed allocations.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans.</p> <p>A Strategic Transport Assessment for Bridgnorth is being undertaken to inform infrastructure requirements in association with development proposals for the town, as recognised within the proposed development guidelines for site BRD030 (Tasley Garden Village).</p> <p>The Shropshire Viability Study is based on cautious assumptions regarding infrastructure requirements and contributions associated with potential development sites. However inevitably until the detailed Planning Application stage, the full infrastructure requirements and contributions for a potential development cannot be finalised, as not all necessary information will be available until this stage. Nevertheless, Shropshire Council considers the Shropshire Viability Study is a robust assessment of viability based on the information available at the strategic plan making stage.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0427	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Bridgnorth	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan has not been justified as an appropriate strategy. It has not been demonstrated that all reasonable alternatives have been considered, and sufficient, proportionate credible evidence has not been provided. Many strategic documents are missing or lacking credible evidence. We therefore consider the plan to be “not sound”.</p> <p>No community meetings have occurred during the Regulation 19 and Regulation 18 consultation period.</p> <p>No evidence that representations made during Regulation 18 consultations have been considered.</p> <p>A reasonable alternative to the proposed approach has been presented during the Reg 18 stage of consultation, but no consideration or feedback on this proposal has been provided.</p> <p>Consider that for the Local Plan to be justified as an appropriate strategy, the following is required:</p> <ul style="list-style-type: none"> <li>-A Local Housing Need Assessment for Bridgnorth and justification for the level of housing proposed, without this a decision on the appropriateness of levels of development proposed cannot be reached.</li> <li>-Local Economic Assessment of the Bridgnorth Place Plan Area and justification for the level of employment proposed.</li> <li>-Evidence of the deliverability and viability of the employment land supply (the Shropshire Viability Study does not specifically consider this).</li> <li>-Evidence demonstrating how significant shortfalls in past delivery of jobs, housing and businesses will be addressed.</li> <li>-Justification of the proposed housing requirement (30,800 dwellings) for Shropshire, when the local housing need calculation is some 25,894 dwellings.</li> <li>-Evidence on provision of single occupancy dwellings (sub-national housing projections predict a significant proportion of growth is associated with such households).</li> <li>-Strategic Highway Assessment for Bridgnorth and explanation of how Bridgnorth can be part of the Strategic Transport Corridor.</li> <li>-Infrastructure Plan.</li> <li>-Evidence that sustainable growth, addressing Bridgnorth's low level of employment self-containment would result from planned housing and employment allocations (it is unclear whether past employment completions have kept pace with past housing completions). Existing housing allocations remain to be delivered and there remains a significant shortfall in employment delivery.</li> </ul>
A0427	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan has not been positively prepared, and is therefore not sound, because:</p> <ul style="list-style-type: none"> <li>-An assessment of local housing need for the Bridgnorth Place Plan Area has not been undertaken. Without this, housing need for Bridgnorth cannot have been objectively assessed. The best assessment of housing need is that undertaken by Bridgnorth District Council in 2006. Extrapolating this to 2036, 15,168 dwellings are needed by 2036, compared with the 16,200 dwellings proposed by the version draft Local Plan at that time. This has been submitted to Shropshire Council in response to Regulation 18 consultation but no feedback has been provided.</li> <li>-‘Statements of Common Ground’ (SoCG), prepared under the Duty to Cooperate, have not been agreed with other Local Authorities. Paragraph 2.27 of the draft Shropshire Local Plan confirms that discussions have been held but that SoCG will only be available when the plan is submitted for Examination, as such they are not available for consideration as part of the Regulation 19 consultation.</li> </ul> <p>Such SoCG would include agreement on the housing needs of adjacent and other local authorities and the extent to which they anticipate not being able to meet them - we understand that not all the other local authorities have completed their own housing needs assessments.</p> <p>Shropshire Council is proposing to contribute 1,500 dwellings to meet the needs of the Association of Black Country Authorities (ABCA). However, we note that none of the members of ABCA are directly neighbouring authorities to Shropshire. It may be more appropriate for Telford and Wrekin Council to contribute to this need. Furthermore, we can find no evidence that any financial contribution has been agreed with these authorities to cover the additional infrastructure costs that will be needed to provide for the additional 1,500 dwellings. Again, without this information we consider that the Local Plan has not been positively prepared or objectively assessed.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0427	B006	<p>Prepare proportionate and credible evidence to justify the proposed strategy and consider all available alternatives.</p> <p>Provide all evidence missing before seeking approval for submission of the draft Shropshire Local Plan.</p> <p>Modify the draft Shropshire Local Plan so that it is consistent with the 1st Edition of the Bridgnorth Plan (appendix to the representation).</p> <p>Reduce the scale of development around Bridgnorth to no more than 1,000 dwellings (including the existing SAMDev Plan allocations), do not identify a single site for development and repeat the Regulation 18 stage to ensure community involvement.</p> <p>Delete proposed allocations STC002 and P58a.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, reasons for proposing to exceed this need are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Shropshire Council also considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and national legislation. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Responses.</p> <p>All views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan. A summary of responses to each 'Regulation 18' stage consultation is available on the Shropshire Council website and form appendices of the Consultation Statement prepared for the draft Shropshire Local Plan.</p> <p>Shropshire Council considers that a proportionate and robust evidence base has been prepared to inform the Local Plan Review. This includes such evidence as a Viability Study, Local Housing Need Assessment, Strategic Housing Market Assessment, Place Plans and Strategic Infrastructure Implementation Plan, Economic Development Needs Assessment and Employment Land Review.</p> <p>A Strategic Transport Assessment for Bridgnorth is being undertaken to inform infrastructure requirements in association with development proposals for the town, as recognised within the proposed development guidelines for site BRD030 (Tasley Garden Village).</p>	No
A0427	B007	<p>Reduce the housing requirement for Shropshire by removing the allocation for the Association of Black Country Authorities (ABCA) under the Duty to Cooperate.</p> <p>Under the Duty to Co-operate approach Telford and Wrekin Council to assess if housing and employment need can be met more sustainably by them.</p> <p>Information already provided by Bridgnorth Plan Steering Group, Save Bridgnorth Green Belt and others, should be taken into account during the plan-making process.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Responses to Local Plan Review consultations have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0427	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	No	Not Specified	Not Specified	<p>Consider neither the 'Gunning Principles' for consultation nor the process require within Shropshire Council's 'Statement of Community Involvement' have been adequately followed.</p> <p>Concern over compliance with 'Gunning Principles' are:</p> <ul style="list-style-type: none"> <li>-There should be sufficient information for intelligent consideration. Do not consider information provided by the promoters of BRD030 was sufficient to allow informed comments and was inaccurate.</li> <li>-There should be adequate time for consideration and response.</li> <li>-'Conscientious consideration' must be given to consultation responses before a decision is reached. No feedback on how submissions have been considered and taken into account has been provided by Shropshire Council.</li> </ul> <p>With regard to the 'Gunning Principles' within the 'Statement of Community Involvement' (SCI):</p> <ul style="list-style-type: none"> <li>-Shropshire Council have not 'engaged in a timely and constructive manner'. There has been a series of consultation exercises, but responses, including from the local community, Parish Councils and Bridgnorth Plan Steering Group have been ignored and no response provided.</li> <li>-The concept of BRD030 (Tasley Garden Village) was only revealed in April 2020, with the promoters undertaking just 1 month's consultation, during the Covid-19 pandemic using a short notice video conference meeting within which many residents were unable to participate, and ending on 3rd June 2020. Shropshire Council then undertook a Regulation 18 Consultation commencing on 3rd August 2020, too short a period for consideration of such a significant change. Too short notice was also provided about proposed changes, and the level of consultation was not proportionate given the scale of proposals and significance of the proposed change. Consider a majority of residents were unaware of proposals.</li> <li>-With regard to 'constructive consultation', the local community have consistently expressed concern that a full infrastructure plan, showing deliverability and funding, is needed for a proposal on this scale and one has not been prepared. Submissions made have not been acknowledged, demonstrating a total lack of constructive consultation.</li> <li>-Shropshire Council have held only one community consultation meeting around Bridgnorth, during the first Regulation 18 Consultation. No meetings have occurred during the second Regulation 18 or Regulation 19 Consultations. Outputs from these meetings have not been considered and neither have surveys undertaken by the Bridgnorth Plan Steering Group.</li> <li>-Shropshire Council has used over-structured methods to receive submissions, to simplify administration, which has reduced lines of consistent argument to isolated comments on individual paragraphs of draft documents.</li> <li>-Methods used to inform and engage communities in the planning process have been totally inadequate.</li> <li>-The SCI requires Shropshire Council to 'provide information on how people's views have been handled, including reporting back to communities ...'. Shropshire Council has provided summaries of submissions to Regulation 18 consultations however this does not begin to meet this commitment.</li> </ul> <p>Additionally questions to Shropshire Council Cabinet on Monday 7th December 2020 were evaded - question and response appended to representation.</p>
A0427	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0427	B008	<p>Modify the draft Shropshire Local Plan in line with the 1st Edition of the Bridgnorth Plan (appendix to the representation).</p> <p>Reduce the scale of development around Bridgnorth to provide sufficient dwellings to meet the need for a 10-year land bank. Then undertake a new Site Assessment for longer-term needs, giving the opportunity to demonstrate the Statement of Community Involvement has been revisited and its requirements met.</p>	<p>Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Shropshire Council also considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Each stage of consultation has been supported by a proportionate evidence base. Following each of these stages of consultation, a summary of the responses received has been prepared and form appendices to the Consultation Statement prepared for the 'Regulation 19' Pre Submission Draft of the Shropshire Local Plan.</p> <p>With regard to proposed allocation BRD030 (Tasley Garden Village), this site was identified as a proposed allocation and subject to consultation within the 'Regulation 18' Plan Preparation stage of the Local Plan Review - specifically, within the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (August 2020 – September 2020).</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>Where following consultation it has been proposed to make amendments to proposals in response to the consultation process or indeed any other emerging evidence, this has been documented within relevant subsequent consultation documents (reflecting the iterative process undertaken during the Regulation 18 Plan Preparation stage). Furthermore where such changes relate to proposed allocations (which have been the subject of the most significant level of response) this has also been documented within updated site assessments, provided as part of the evidence and consultation material for relevant stages of consultation.</p>	No
A0427	B009	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0428	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	No	<p>ONS growth forecasts equate to 799 dwellings, yet proposals are for a further 1,455 dwellings. How has this figure been arrived at? Dwelling completions will need to double to achieve this, is this sustainable?</p> <p>A steering group of members of local Town/Parish Councils consider no additional employment land and only a small number of additional dwellings are required in Bridgnorth, will these recommendations be accepted?</p> <p>Land in ownership of respondent (agricultural and riding area/menage) will be surrounded by proposed development (BRD030). Concerned about impact on use of this land (quite/safe space) and livestock (examples of how animals can be harmed by humans within representation). Consider BRD030 should be removed from the draft Shropshire Local Plan or will seek compensation and removal of the public right of way (PROW) which crosses their land.</p> <p>BRD030 is considered an unsustainable location; is not a garden village as it is not self-contained with community facilities, shops, school, petrol station etc - will the promoter sign up/implement garden village principles; is outside the development boundary; is away from main employment areas of the town/region (increasing commuting); and is contrary to planning policies/planning process. BRD030 is inappropriate post Covid 19 where a green recovery rather than business as usual is preferred. Also concerned about impact on the proposed relocation of the livestock market, sterilisation of mineral resources, impact of mineral winning on occupiers, flooding, social (given demographics need for additional schools needs to be assessed) and physical (particularly roads/transport which have numerous pinch-points and are subject to congestion with no plans for improvements, necessary improvements must be identified and implemented before development; broadband; and electricity) infrastructure; and the environment (Shropshire Wildlife Trust object to the proposals and the site is in proximity of Undertone Nature Reserve).</p> <p>BRD030 will not provide services/facilities until phase 4 of the development (9-14 years). How will residents of BRD030 access services/facilities during this period and beyond. A footbridge over the A458 is proposed but not illustrated, it is unclear if promoters own relevant land and a single crossing point is likely to be intimidating. Will this not encourage use of private transport/unsafe crossing of the A458.</p> <p>Consider affordable housing proposed on BRD030 will be unaffordable to local incomes.</p> <p>Concerned about cumulative impact of BRD030 and:</p> <ul style="list-style-type: none"> <li>-Existing allocations at Tasley. Would the existing allocation negate proposals on BRD030. Combined they will double the size of the town, this cannot be desirable or sustainable.</li> <li>-Wider development proposals across Shropshire in relation to limited water resources and climate change (construction/lifetime energy requirements - this does not align with the Climate Emergency).</li> </ul> <p>Will BRD030 result in a monopoly on housing development for the site promoter?</p> <p>Within the Regulation 18 Consultation on preferred sites, proposals involved release of land in the Green Belt (Stanmore Garden Village) and alternative ruled out due to factors including flood risk (significant past flooding in Bridgnorth and suitable measures must be put in place before development), landscape, accessibility constraints (including the A458) and impact on existing services/facilities. What has changed to allow consideration of BRD030?</p> <p>Consider Tasley should be identified as Green Belt due to landscape quality. Also can further expansion towards Morville be resisted in the future?</p> <p>Timing during Covid 19 gives insufficient time for residents and businesses to be made aware and respond.</p>
A0428	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	No	See A0428 B001. Response consistent with the first element of A0428 B001.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0428	B001	BRD030 should be removed from the draft Shropshire Local Plan.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans; and a Water Cycle Study, which considers availability of water and water infrastructure.</p> <p>Draft site guidelines for proposed allocation BRD030 would provide a framework for any future masterplanning and development of the site. They address such issues as infrastructure provision (including highways) and design and layout of the development.</p> <p>The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No
A0428	B002	<p>BRD030 should include a substantial buffer of the respondents land.</p> <p>The public footpath through the respondents land should be removed.</p> <p>Respondents land should be included in the proposed development boundary and its development permitted.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans; and a Water Cycle Study, which considers availability of water and water infrastructure.</p> <p>Draft site guidelines for proposed allocation BRD030 would provide a framework for any future masterplanning and development of the site. They address such issues as infrastructure provision (including highways) and design and layout of the development.</p> <p>The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0428	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	No	See A0428 B001. Response consistent with the second element of A0428 B001.
A0428	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	No	See A0428 B001. Response consistent with the third element of A0428 B001.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0428	B003	<p>BRD030 should include a substantial buffer of the respondents land.  The public footpath through the respondents land should be removed.  Respondents land should be included in the proposed development boundary and its development permitted.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.  Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.  Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.  The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans; and a Water Cycle Study, which considers availability of water and water infrastructure.  Draft site guidelines for proposed allocation BRD030 would provide a framework for any future masterplanning and development of the site. They address such issues as infrastructure provision (including highways) and design and layout of the development.  The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No
A0428	B004	<p>BRD030 should include a substantial buffer of the respondents land.  The public footpath through the respondents land should be removed.  Respondents land should be included in the proposed development boundary and its development permitted.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.  Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.  Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.  The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans; and a Water Cycle Study, which considers availability of water and water infrastructure.  Draft site guidelines for proposed allocation BRD030 would provide a framework for any future masterplanning and development of the site. They address such issues as infrastructure provision (including highways) and design and layout of the development.  The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0428	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	No	See A0428 B001. Response consistent with the fourth element of A0428 B001.
A0428	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	No	See A0428 B001. Response consistent with the fifth element of A0428 B001.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0428	B005	BRD030 should include a substantial buffer of the respondents land. The public footpath through the respondents land should be removed. Respondents land should be included in the proposed development boundary and its development permitted.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans; and a Water Cycle Study, which considers availability of water and water infrastructure.</p> <p>Draft site guidelines for proposed allocation BRD030 would provide a framework for any future masterplanning and development of the site. They address such issues as infrastructure provision (including highways) and design and layout of the development.</p> <p>The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No
A0428	B006	BRD030 should include a substantial buffer of the respondents land. The public footpath through the respondents land should be removed. Respondents land should be included in the proposed development boundary and its development permitted.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans; and a Water Cycle Study, which considers availability of water and water infrastructure.</p> <p>Draft site guidelines for proposed allocation BRD030 would provide a framework for any future masterplanning and development of the site. They address such issues as infrastructure provision (including highways) and design and layout of the development.</p> <p>The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0428	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	No	See A0428 B001. Response consistent with the sixth element of A0428 B001.
A0429	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	Policy SP2 para 6 Hierarchy of Settlements is unsound. Trefonen has very little employment at all and no prospect of any in the future. No peak time public transport- very little bus service at all and non at peak. These are contrary to SP3 climate change and sustainability objectives... SO5. SO6. SO12 policies render these documents unsound.
A0430	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	No	Not Specified	Whilst this monitoring-led approach to the delivery of the housing strategy is supported, the Council should ensure in the first instance that sufficient flexibility for housing land supply is provided in the draft SLP in a way that supports housing delivery in line with the spatial strategy.
A0430	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Trefonen	Not Specified	No	Not Specified	Trefonen is the only Hub with no allocations, and so is wholly inconsistent with the approach to all other hubs, with no evidence to justify the lack of a housing allocations. The justification for Trefonen having no allocations is poor.
A0430	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	Trefonen is the only Hub with no allocations, and so is wholly inconsistent with the approach to all other hubs, with no evidence to justify the lack of a housing allocations. The sites in the SA for Oswestry were ultimately discounted due to there being a greater need for affordable and/or low-cost housing within the Parish Council's Rural Housing Needs Survey (2018). This hardly illustrates evidence of excessive need for affordable housing in Trefonen, nor has any evidence been provided to demonstrate a lack of demand for open market housing that might justify the departure away from the approach the Council has taken in relation to all the other Community Hubs. The survey's results are inconsistent with the actual results of the survey.
A0430	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP7	Not Specified	No	Not Specified	Draft Policy DP7 now introduces a maximum site size of 'normally 10 dwellings', and an increased percentage of affordable housing (from 66% to 70%). With these more onerous additions to the draft policy, it is difficult to comprehend how the development it is seeking to encourage will be delivered, when the current policy which is less restrictive failed to generate new development of this nature. Furthermore, this policy is not supported by any evidence to demonstrate that these improvements will lead to the delivery of local needs affordable housing across the county, thereby undermining its ability to ensure there is adequate housing opportunities for households with a local connection. The proposed housing guidelines of 55 new dwellings for Trefonen rely entirely on new development proposals satisfying this policy. Given the lack of development being delivered under the current 'cross-subsidy' policy, we strongly question whether a more onerous policy as currently drafted will lead to the delivery of 55 new homes in the village.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0428	B007	BRD030 should include a substantial buffer of the respondents land. The public footpath through the respondents land should be removed. Respondents land should be included in the proposed development boundary and its development permitted.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans; and a Water Cycle Study, which considers availability of water and water infrastructure.</p> <p>Draft site guidelines for proposed allocation BRD030 would provide a framework for any future masterplanning and development of the site. They address such issues as infrastructure provision (including highways) and design and layout of the development.</p> <p>The consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No
A0429	B001	Para 5.41 relaxes Hub requirements of employment and peak time transport. This conflicts with climate change emergency policy which opens the door for subjective assessment and opens up just an opinion only and is in conflict with how other settlements are assessed which proves SP2 unsound	Shropshire Council undertook a robust assessment during the Hierarchy of Settlement process and Trefonen's services and facilities meant that its score resulted in it being a Hub. Notably there are no housing allocations in the settlement as part of this Plan Review.	No
A0430	B001	The Council should ensure in the first instance that sufficient flexibility for housing land supply is provided in the draft SLP in a way that supports housing delivery in line with the spatial strategy.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that it has a robust five year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. Appendix 5 illustrates this supply - identifying completions, commitments (including existing and proposed allocations) and appropriate windfall allowances (for settlements with development guidelines), which totals around 31,000 dwellings (excluding any windfall allowance for the wider rural area). The Housing Land Supply will be kept under review as part of the annual assessment of the Five Year Housing Land Supply.</p>	No
A0430	B002	In order for the draft SLP to be justified, effective and consistent we suggest the following changes are necessary: <input checked="" type="checkbox"/> We consider that housing allocations should be identified for Trefonen to ensure delivery of the residential development requirement. <input checked="" type="checkbox"/> Our Client's site (TRF014) should be considered as a site allocation to secure delivery of the housing requirement for Trefonen and key objectives for the area.	<p>The site assessment conclusion for TRF014 states: "Site has good access but is slightly far out but is still in proximity to the main services of the village. However available information about local housing need suggests that the greatest need is for affordable and low cost market housing of a range of types and tenures. No site allocations are therefore proposed and it is instead proposed that the housing guideline will be delivered through the development of appropriately located 'cross-subsidy' exception sites."</p> <p>Therefore site would be appropriate for cross subsidy or affordable etc. The housing guideline is also relatively small and a large site of the size suggested may be considered inappropriate.</p>	No
A0430	B003	In order for the draft SLP to be effective and consistent with national planning policy we suggest the following change is necessary: Allocated housing sites should be identified in Trefonen and shown on the Policies Map to ensure delivery of the residential guidelines.	Shropshire Council considers that the proposed development strategies for each settlement, including Trefonen, are appropriate, effective, sustainable and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Identification of proposed site allocations has been informed by a proportionate and robust site assessment process.	No
A0430	B004	In order for the draft SLP to be justified, effective and consistent with national planning policy we suggest the following changes are necessary: • Reduce the percentage of 70% to less than 66% to ensure greater flexibility is built in respond to Shropshire's diverse range and type of settlements and to ensure cross subsidy exception sites come forward over the course of the Local Plan period. • Any percentage should be fully justified by the evidence base to ensure its effectiveness.	<p>Noted. There is significant need for affordable housing. Inclusion of specific policies in the Draft Shropshire Local Plan setting out requirements for a range of affordable delivery options provides greater clarity for the development industry to bring appropriate schemes forward.</p> <p>The cross subsidy exception scheme draft policy is primarily intended as a delivery mechanism for affordable housing and not the provision of open market dwellings. This is reflected in the need to deliver at least 70% affordable housing tenures and directly reflect the needs outlined in a housing need survey based on tenure and size of dwellings. A Housing Supplementary Planning Document will support housing policies and will be used appropriately to provide further guidance and detail.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0431	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Hadnall	Yes	Yes	Yes	Fully support Hadnall's status as a Hub and site HDL006. I would also like to see HDL013 and HDL016 included within the development boundary.
A0432	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP4	Not Specified	No	No	As with other parts of the document – too woolly, lacking clear criteria that can be considered when overriding development areas. Example – “reasonable access to” – this means properly reasoned i.e. taking account of relevant factors, not considering irrelevant factors, applying appropriate weight to relevant factors – without clarity about what are the relevant criteria in considering reasonableness it allows a coach and horses to be driven through the development areas. No account taken of the Shrewsbury Big Town Plan on rural bus services. Lack of clarity prejudices other public bodies e.g. Parish Councils.
A0432	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP6	Not Specified	No	No	As with other parts of the document – too woolly, lacking clear criteria that can be considered when overriding development areas. Example – “reasonable access to” – this means properly reasoned i.e. taking account of relevant factors, not considering irrelevant factors, applying appropriate weight to relevant factors – without clarity about what are the relevant criteria in considering reasonableness it allows a coach and horses to be driven through the development areas. No account taken of the Shrewsbury Big Town Plan on rural bus services. Lack of clarity prejudices other public bodies e.g. Parish Councils.
A0433	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 West Felton	Yes	No	Yes	In West Felton, Shropshire Council has allocated site WEF025. Shropshire council's sustainability assessment gave this site a rating on -5 (Good). 10 sites had a better sustainability score than this site. 15 had a worse score. One other site had the same score. Objectively there were more sustainable sites they could have chosen.
A0434	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.3 Grinshill	Not Specified	No	Not Specified	There is insufficient justification for Grinshill village having 'Community Cluster' status. The following points support this removal :- The Government has placed a presumption in favour of sustainable development at the heart of its approach to planning (NPPF). Further new residential development in Grinshill would not be sustainable because the village is not served by any safe and accessible public transport. There is no village shop or public house to sustain. More residential development in Grinshill would conflict directly with the stated climate change aims of SP3 (there is no public transport serving Grinshill or to link or integrate with). In 2015 when the residents were asked for their views on future village priorities as part of the Grinshill Parish Plan review, only 3 out of 60 returned responses wanted to extend the village boundary. During the Local Plan preparation period Grinshill village was linked with the nearby larger Clive settlement to justify a Community Cluster designation for Grinshill, with Clive being proposed as a Community Hub. More recently Clive has permanently lost two key community facilities (village shop and bowling green) which results in Clive not meeting the definition of a significant rural service centre. Without this nearby Community Hub the justification for Grinshill becoming a Community Cluster is further reduced. The Neighbourhood Plan process should be used to determine if the residents of Grinshill want Community Cluster status for their village.
A0435	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and S14.2	Not Specified	Not Specified	Not Specified	Trefonen's proposed amended designation from "Countryside" to Hub is flawed in several respects and consequently assessment points allocated incorrectly. There are no employment opportunities within the village other than 1 part time vacancy in the small village shop/post office. Please note that this is a small facility necessitating a separate shopping trip into Oswestry for a greater variety of provisions. Secondly, the bus service is very limited and a car or independent transport would generally be necessary for visits to supermarkets/ doctors/ dentists/ hospital/ opticians etc., Thirdly, the library service is a mobile facility, once a fortnight. Having spoken to many fellow residents, this would be gladly given up to accurately reduce the points allocation used to allocate "Hub" status and preserve our "Countryside" designation.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0431	B001	I would like to see HDL013 and HDL016 included within the development boundary.	The Development Boundaries are considered appropriate for each of the Hubs in relation to their built form and areas which are appropriate for development over the plan period.	No
A0432	B001	Specific criteria to be taken into account stated wherever there is a qualitative judgement to be made.	Noted. Shropshire Council consider the criteria and requirements identified within draft Policy DP4 are appropriate. The terminology used within policies is generally consistent with that used in national policy. The Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP4 the relevant requirements of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations. A Housing SPD will also support housing policies and provide further guidance	No
A0432	B002	Specific criteria to be taken into account stated wherever there is a qualitative judgement to be made.	Noted. Shropshire Council consider the criteria and requirements identified within draft Policy DP6 are appropriate. The terminology used within policies is generally consistent with that used in national policy. The Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP4 the relevant requirements of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations. A Housing SPD will also support housing policies and provide further guidance	No
A0433	B001	A robust needs assessment must take place before sites are allocated and the needs properly weighted in the sustainability assessments	The SA is not the defining factor when allocating sites. Other criteria and factors are taken into consideration as outlined in the site assessments. The conclusion for WEF025 is: "Site is adjacent to existing development and would link onto this, acting as a natural extension to an area already under development. The site is suitably located in terms of proximity to services, and would support an appropriate number of dwellings for the village. Furthermore, there are few constraints given by service providers for this site. Good SA scoring. Southern element of site not to be allocated - see Design Requirement below." Notably the SA score was 'Good' for the preferred allocation	No
A0434	B001	Remove Grinshill village from Schedule SP2.3: Community Clusters and S17.3(1a).	Shropshire Council considers that the approach used to identify Community Clusters, by which communities can opt-in or opt-out is appropriate and reflects the intended purpose of such Community Clusters - settlements with aspirations to maintain or enhance their sustainability. As such, it is considered appropriate for Grinshill to be identified as a proposed Community Cluster.	No
A0435	B001	Revert Trefonen's status back to countryside after the scoring is corrected.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment. As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0436	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Policies Map	Not Specified	No	Not Specified	<p>It appears that the settlement development boundary of St Martins, identified as a Community Hub has not been reviewed to take account of / reflect developments that have occurred on the edge of the settlement. The plan is not positively prepared as a result. Windfall development is unnecessarily restricted despite the sustainable credentials of the settlement. The Plan is not therefore positively prepared or justified.</p> <p>Sites that should properly be considered under Policy SP8 as sustainable windfall sites in Community Hubs would, on the basis of the Policy Map, incorrectly be considered as falling within open countryside for policy purposes.</p> <p>The Inspector is asked to look at the soundness of St Martins settlement boundary.</p> <p>In particular SMH041 'West of Cottage Lane, St Martins' remains outside the settlement boundary despite being surrounded on all sides by an existing sub-urban housing development. It appears the Council has simply not correctly reviewed the boundaries to reflect existing developments.</p> <p>An outline planning application was made on part of the site Ref 16/03362/OUT, dated 28 July 2016 for residential development of circa 8 dwellings. It was refused solely due to its location outside the settlement boundary. The Inspector determining a subsequent appeal noted:</p> <p>The site is surrounded on all sides by existing suburban housing development and is effectively landlocked. The site lies outside the development boundary of St Martins. Immediately to the south is a small recently built housing scheme of nine properties that was approved at a time when the Council could not demonstrate a five year housing supply.</p> <p>That development should now be included in the Local Plan review as being within the development boundary of St Martins as it is a well-established development clearly forming part of, and not separated from, other built development in St Martins. It clearly forms part of the Community Hub.</p>
A0436	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2	Not Specified	No	Not Specified	<p>The development boundary of St Martins has not been reviewed or amended to reflect development on the ground. In particular, SHLAA site SMH041 is surrounded on all sides by existing suburban housing development and is effectively landlocked. Immediately to the south is a small housing scheme of nine properties that was approved at a time when the Council could not demonstrate a five year housing supply. This development should clearly be included in the development boundary. It is not separated from development currently identified as being within the development boundary and is clearly part of the Community Hub. SHLAA site SM041 provides a windfall opportunity. In fact, had the site been correctly assessed as being within a Community Hub boundary it would have scored significantly different in the SA. To plan is not positively prepared as the development boundary of St Martins excludes development sites that would clearly be appropriate as windfall sites, subject to meeting criteria of Policy SP8.</p>
A0436	B003 for MJ	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SA para 7.11	Not Specified	No	Not Specified	<p>An outline consent was refused on site SMH041 due to it being open countryside. However a development has completed immediately south of the site and should now be included in the development boundary. On this basis, the current SA appraisal of SMH041 is flawed. The assessment states:</p> <p>The Surrounding character is described as "Residential to west, north and east. Agriculture (grazing) to south." This gives the incorrect impression that it is adjacent to open fields. That is not the case; three boundaries are adjacent to residential development and one is adjacent to the road. To all intents and purposes this is a pocket of land situated within the built-up and physical boundaries of the Community Hub settlement. The development of this site would not therefore extend the physical development boundary of St Martins. The development boundary has just not been updated to reflect more recent development surrounding it. This is an entirely illogical stance given the current Plan review. Errors flow from the Council's failure to ensure development boundaries remain up to date. The incorrect description of the site in the site selection process – the positive impact on Sustainability Objectives including SO2 – SO6, SO10-12, SO15 and 16 is not recognised or assessed to reflect the location of the site. This site should have been found suitable for development now.</p> <p>Had the Council correctly assessed the site it would have scored as 'Good' rather than 'Fair'.</p>
A0436	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	<p>Given that Community Hubs are considered significant rural service centres and the focus for development within the rural area, it is not clear why the development boundary for St Martins (Oswestry Maps) has not been changed to take account of existing developments. This results in sustainable sites within the existing built form of this Community Hub being incorrectly identified within open countryside for policy purposes and any opportunities for sustainable windfall development that meets the criteria of Policy SP8 lost. The Plan is not therefore positively prepared. In particular, SHLAA site SM041 is surrounded on all sides by existing suburban housing development and is effectively landlocked. Immediately to the south is a small housing scheme of nine properties that was approved at a time when the Council could not demonstrate a five year housing supply.</p> <p>This development should clearly be included in the development boundary of St Martins. It is a well established development clearly forming part of, and not separated from, other built development in St Martins. It clearly forms part of the Community Hub.</p> <p>SHLAA site SMH041 provides a windfall opportunity. In fact, had the site been correctly assessed as being within a Community Hub boundary it would have scored significantly different in the SA.</p> <p>To plan is not positively prepared as the development boundary of St Martins excludes development sites that would clearly be appropriate as windfall sites, subject to meeting criteria of Policy SP8 and contribute to the areas housing needs. I can find no evidence that the development boundary has been reviewed.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0436	B001	The development boundary for St Martins should be reviewed to correctly reflect the development that has occurred on the edge of the settlement and ensure the Plan is positively prepared.	Shropshire Council considers that the development strategy proposed for St Martins (including existing and proposed allocations), which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). It is also considered that the proposed development boundary for St Martins is appropriate, having had due consideration of the built form of the settlement.	No
A0436	B002	As a sustainable Community Hub, amendments to the development boundary of St Martins are required to ensure the plan is positively prepared.	Shropshire Council considers that the development strategy proposed for St Martins (including existing and proposed allocations), which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). It is also considered that the proposed development boundary for St Martins is appropriate, having had due consideration of the built form of the settlement.	No
A0436	B003 for MJ	It is necessary to review the development boundary for St Martins to include existing, now well-established developments adjacent to the existing boundary. SHLAA sites should be reviewed to take account of those revisions where necessary. SMH041 should be allocated	The Council considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.  Shropshire Council considers that the development strategy proposed for St Martins (including existing and proposed allocations), which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). It is also considered that the proposed development boundary for St Martins is appropriate, having had due consideration of the built form of the settlement. Likewise with the preferred allocations - the sites selected are considered as being the most suitable for allocation for the settlement in terms of their respective characteristics and location within the settlement and the housing numbers that could be delivered in these sites.	No
A0436	B004	The Development boundary of St Martins, a Community Hub, requires review and amending to reflect housing development that has occurred and ensure the plan is positively prepared and Policy SP8 is justified.	Shropshire Council considers that the development strategy proposed for St Martins (including existing commitments (including existing allocations), the proposed allocations and the proposed windfall allowance), which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). It is also considered that the proposed development boundary for St Martins is appropriate, having had due consideration of the built form of the settlement.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0437	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>The Council stated that it would apply a consistent methodology for the identification of Community Hubs, assessed through the Hierarchy of Settlements document. The policy identifies Community Hubs as significant rural service centres but it is unsound in its application as it is not based on up to date or accurate evidence and the treatment of changes to local services and facilities throughout the Plan's development has been inconsistent. The Hierarchy of Settlements (August 2020) supports the Local Plan Review and Policy SP2, by setting out the methodology and conclusions for identifying Shropshire's service centres. The purpose being to inform Policy SP2 with specific and consistent criteria about Shropshire's settlements and their sustainability. Despite consultation responses highlighting changing evidence on the availability of local services and facilities in some of Shropshire's settlements, including the most recent Regulation 18: Pre-Submission Draft of the Local Plan (August 2020- September 2020), Policy SP2 does not take these into account.</p> <p>Previous formal and informal consultations on the Local Plan Review have repeatedly highlighted the misidentification of available local services for the village of Clive. However Clive remains under Policy SP2 as a Community Hub and deemed a 'significant rural service centre' but without the actual presence of the necessary associated services and facilities to support this. This therefore raises concerns about the soundness of the application of the Hierarchy of Settlements evidence base in the development of the Regulation 19 Plan and the application of a consistent approach cross the whole of the Plan area. For example, the village of Myddle, like Clive, was initially identified as a Community Hub but following closure of the local convenience store in summer 2018, the evidence base was reviewed and it was determined that the village fell below the threshold to be considered a 'significant rural service centre'. The same consistent application of this methodology has not been applied to the village of Clive, despite falling under comparative circumstances with a closure of a local convenience store. The village thereby also falls below the threshold for a Community Hub. This was raised with Shropshire Council by the Parish Council, local residents and indeed the shop owner during the Regulation 18 consultation stage but the Regulation 19 Plan remains unchanged, rendering Policy S2.2 unsound as it is not justified and based upon out of date evidence.</p>
A0437	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	<p>There are inaccuracies in the HoS. The current scoring within the Hierarchy of Settlements for Clive includes a bowling green as an outdoor sports facility and a local convenience store. Neither of these facilities exist following the closure of both the bowling green and the local convenience shop. The shop has now closed three times in recent years and has been shut for significant periods. It is clearly unviable as a convenience store.</p> <p>The Local Planning Authority has previously recognised that there is no bowling green as the facility now falls under a private residential dwelling. This was confirmed in the Shropshire Council Playing Pitch and Outdoor Sports Strategy Assessment Report (Oct 2020). This should supersede the Open Space Needs Assessment 2017 as it is based on more up to date and comprehensive information. The Open Space Needs Assessment 2017 was a desk based update of data from 2009.</p> <p>The Local Planning Authority has acknowledged that it has received correspondence from both the Parish Council and the shop owner that the shop is no longer in use. This has been confirmed through a formal change of use planning application from the owner to provide a residential annex for this former shop (ref 21/00048/FUL). The Local Planning Authority were notified of these changes through the Regulation 18 consultation but no associated updates have been made to the Regulation 19 Plan, rendering Policy SP8 as unjustified and unsound.</p> <p>The Hierarchy of Settlements evidence base and Local Plan Policies are now based on inconsistencies which render them unsound.</p> <p>Revisions to the Hierarchy of Settlements evidence base over the Plan development has led to inconsistencies in the policy with the definition of Community Hubs continuing to be set out as 'settlements considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities'. The assessment criteria and associated threshold no longer require such facilities to be present. This is illustrated by the example of Clive which when assessed evidently doesn't meet the criteria for a Community Hub in that it relies upon other settlements to meet many day to day needs such as employment and convenience goods. The Plan and Policy SP8 is therefore considered to be unsound as the methodology and application of associated evidence does not meet the intended definition of a Community Hub and overall settlement hierarchy needed to maintain overall sustainability and is therefore not justified.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0437	B001	Policy SP2 should remove reference to Clive as Community Hub as current evidence on availability and accessibility of local facilities and services means it does not meet the definition of a significant rural service centre as defined by the Hierarchy of Settlements evidence base and subsequent Local Plan policies.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0437	B002	Policy SP8 should remove reference to Clive as Community Hub as current evidence means it does not meet the definition of a significant rural service centre as defined by the Local Plan Review	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to those Community Hubs proposed in the Wem Place Plan Area.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0437	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Not Specified	No	Not Specified	<p>As policies (SP2 and SP8) that guide Settlement policy 17.2 are unsound, Policy S17.2 is therefore also rendered unsound. Policy 17.2 is based on inaccurate and out of date evidence on settlement sustainability. In addition, there has been inconsistent consideration and treatment about the presence of local facilities and changing circumstances across parishes during the plan development.</p> <p>The current scoring within the Hierarchy of Settlements for Clive includes the bowling green as an outdoor sports facility and the local convenience store. Neither of these facilities exist following the closures of both the bowling green and local convenience shop.</p> <p>These both are under private residential ownership and use. As a result, the scoring threshold for significant rural service centres has not been met and the village of Clive does not meet the requirements to be deemed a Community Hub under Policy S17.2. The Local Planning Authority itself has recognised that there is no bowling green as the facility now falls under a private residential dwelling. This was evidenced in the Shropshire Council Playing Pitch and Outdoor Sports Strategy Assessment Report (Oct 2020). This was a comprehensive assessment undertaken between 2018 and 2019 the accuracy of which has been confirmed by Shropshire Council. In this assessment of bowls clubs and greens, Clive is not recorded as having such a facility. Despite this, consultation with the Local Planning Authority justifies its retention as a local facility for Clive following its inclusion in the Council's Open Space Needs Assessment which is based on out of date data from 2009. The Open Space Needs Assessment itself acknowledged that "without a catchment area analysis it cannot detect the reality of variations in provision within each Place Plan Area". With regard to Clive's local convenience store, the Local Planning Authority has acknowledged that officers have received recent correspondence from the both the Parish Council and owner that the shop is no longer in use and now falls within a residential curtilage. This earlier engagement with the Local Planning Authority has been formalised into a change of use planning application from the owner to provide a residential annex for this former shop (ref 21/00048/FUL).</p> <p>The Local Planning Authority appears to have been inconsistent in taking into account such changes in local services and facilities during the Plan development. Comparative changes have taken place in the village of Myddle where the closure of its local shop resulted in a swift change in designation to Open Countryside. Similar changes have taken place in Cockshutt and Westbury. There is no evidence that any other Parish Council has been asked to provide additional evidence to support this change in designation. Indeed, correspondence regarding changing local facilities between Parish Councils and the Local Planning Authority appear to have been sufficient. In comparison, there is evident disparity between the requirements placed on Clive Parish to further evidence these changes and a deferral by the Local Planning Authority to address via a main modification to the Regulation 19 Plan rather than addressing prior to the Regulation 19 consultation. As a result, the Plan and Policy S17.2 do not meet the tests around being justified and effective and are therefore considered unsound.</p>
A0438	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Not Specified	No	Not Specified	<p>Clive should not be identified as a Community Hub as two services/facilities identified within the Hierarchy of Settlements Assessment are no longer presented. Specifically the bowling green is located within a private garden (and has been for 2 years) and the village shop has now closed (October 2020) and the owner has confirmed it will not be re-opening. Taking these out would lower its score to 47, meaning Clive would no longer exceed the threshold for Community hub status.</p> <p>The post office operates only 2-4 hours a week and as such does not warrant significant points for this service.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0437	B003	Policy SP17.2 should remove reference to Clive as Community Hub as current evidence on availability and accessibility of local facilities and services means it does not meet the definition of a significant rural service centre as defined by the Hierarchy of Settlements evidence base and subsequent Local Plan policies.	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0438	B001	Update the Hierarchy of Settlements Assessment to remove the points attributed to Clive for the bowling green and village shop. This results in the settlements score dropping below Community Hub status. Remove Community Hub status from the settlement within the draft Shropshire Local Plan.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0439	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.4 Cressage 5.184	Not Specified	No	No	5.184. Cressage is the only Community Hub in the Much Wenlock Place Plan Area and has changed its status from being a 'Countryside' settlement since 2015. Why and how has the status changed from Countryside to Community Hub as it does not meet the criteria for allocation as a Hub? This was strongly expressed to the Council after the consultation with Clair Wild and the over 300 responses from the village in 2020
A0439	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.4 Cressage CES006	Yes	No	No	It is unclear from the document how many dwellings will be allowed on this site (CES006) as in one place it states 4 , and in another the conversion of the former Eagles into 2 dwellings and up to 3 new dwellings
A0439	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2(1) CES005	Yes	No	No	<ol style="list-style-type: none"> <li>1. Firstly the status of Cressage as a potential Community Hub has to be proved to allow for housing development</li> <li>2. Should Hub status be approved it is unclear how many houses are proposed for this site as numbers have varied from 60 – 80 .</li> <li>3. Should Hub status be approved it states that access will be from the A458 providing a footway along the frontage to crossing over A458 to existing footway network east linking into village. A secondary pedestrian and cycling access possible on short frontage to Wood Lane. Speed restrictions positioned south of site with traffic calming measures supporting gateway feature at highway access.</li> <li>4. However this point of access is extremely dangerous as many vehicles, especially lorries and HGVs, exceed the speed limit on this dangerous hill leading south out of the village</li> <li>5. Traffic calming via lights of a roundabout would be necessary in order to prevent major incidents concerning both pedestrians and drivers.</li> <li>6. As the village shop, school, bus stop and surgery are all to the east across the A458 it could be very dangerous with young children, buggies or disability vehicles</li> <li>7. Access to Wood Lane will be very difficult due to the steep gradient and existing housing</li> </ol>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0439	B001	I ask that the Independent inspector looks at the previous responses to the consultation from Cressage residents. There were many hundreds of objections and it feels these have not been evaluated or assessed fairly by Shropshire Council.	Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.	No
A0439	B002	That the number of dwellings be clarified. However I agree with the redevelopment of the former public house to residential and development of the carpark , as long as the footpath is resisted behind the existing building away from the A458, and that the site lines at the junction with Sheinton Road are improved	Noted. Shropshire Council considers that the approximate site capacity specified for site CES006 (around 4 houses) is appropriate. This capacity is considered likely to consist of either 1 resulting from the conversion of the existing building and 3 within the wider site or 2 resulting from the conversion of the existing building and 2 within the wider site, dependent on the nature of development undertaken.	No
A0439	B003	I ask that 1. The point scoring for allocation Cressage as a Community Hub be looked at again 2. IF Hub status is confirmed , that the safety of the access to the site CE S005 be reviewed	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. The identification of proposed allocations were informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways matters with colleagues in the Developing Highways team. Sites have been chosen that will deliver a range of benefits for the community including measures to address the issue of traffic speeding through the speed restricted zones of the village. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community. This will require a suitable scale of development for Cressage and the relatively modest housing guideline figure of 80 dwellings is considered to be appropriate to the size and function of the settlement. The greater proportion of this requirement is to be delivered on site CES005 (60 dwellings) which comprises a relatively flat, open and accessible development opportunity. The design of the development scheme for this site may have a positive impact on the traffic flows through the village. Residents of the proposed development will also have ready access to the principal services in the village particularly through the footway network within the village.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0439	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2(2)	Not Specified	Not Specified	Not Specified	I ask the Inspector to evaluate how and if, Shropshire council evaluated and processed the previous consultation responses. Local reports told of staff shortages within Shropshire Council due to the Covid-19 outbreak and many believe this consultation process was unable to happen thoroughly or fairly. How can nearly 300 responses to previous rounds of consultation be ignored? Why was no feedback or acknowledgement given?. There are four 'Gunning principles' for public consultations, including the stipulation that "there is adequate time for consideration and response". The consultation has not taken into account the restrictions on public involvement because of Covid19 restrictions and it is therefore against government guidelines. A Neighbourhood Plan should be drawn up
A0440	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.4 Cressage 5.184	No	No	No	5.184. Cressage is the only Community Hub in the Much Wenlock Place Plan Area and has changed its status from being a 'Countryside' settlement since 2015. Why and how has the status changed from Countryside to Community Hub as it does not meet the criteria for allocation as a Hub? This was strongly expressed to the Council after the consultation with Clair Wild and the over 300 responses from the village in 2020
A0440	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.4 Cressage CES006	Yes	No	No	It is unclear from the document how many dwellings will be allowed on this site (CES006) as in one place it states 4 , and in another the conversion of the former Eagles into 2 dwellings and up to 3 new dwellings

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0439	B004	<p>I ask that the Independent inspector looks at the previous responses to the consultation from Cressage residents. There were many hundreds of objections and it feels these have not been evaluated or assessed fairly by Shropshire Council. I ask the inspector to evaluate the consultation process and request that a Neighbourhood Plan be drawn up. I ask that the Independent inspector reviews the Countryside Charity's objections and responses and considers them in depth. I ask the Independent inspector to review Shropshire Councils consultation process during Covid19 and the obvious impacts that has had on preventing people from replying. As evidence for non compliance with consultation, I am using the Draft Statement of Community involvement of the CPRE January 2021</p> <p>i) The update of the DSCI should have been carried out some time ago, rather than being left to the last minute in order to tie in with the statutory requirements connected with the Regulation 19 consultation on the Draft Plan.</p> <p>ii) The general principles of consultation in the Gunning principles and in the seven Criteria within Government's own Code of Practice on Consultation should be spelt out within the DSCI.</p> <p>iii) The recent Covid-19 related legislation concerning consultation arrangements should be summarised or referenced in the DSCI.</p> <p>iv) Consultations should be for a minimum of 12 weeks, as recommended by Government. Some Parish Councils do not meet often enough to be able to give due formal consideration to a consultation that is for only 6 weeks.</p> <p>v) Consultations should, as far as possible, avoid holiday periods, or be for a significantly extended period if they do straddle a holiday period.</p> <p>vi) Consultation material should be mainly in electronic form but should not be wholly so; traditional methods should still be used until the County has complete fast broadband cover.</p> <p>vii) The Council should not rely on hard pressed Parish and Town Councils to disseminate consultation material.</p> <p>viii) If a direct choice between multiple options is offered in a consultation the Council should ensure that its policies reflect the results of the poll on those options.</p> <p>ix) Reports on consultations should explain how the Council has arrived at its</p>	<p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Each stage of consultation has been supported by a proportionate evidence base. Following each of these stages of consultation, a summary of the responses received has been prepared and form appendices to the Consultation Statement prepared for the 'Regulation 19' Pre Submission Draft of the Shropshire Local Plan.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>Where following consultation it has been proposed to make amendments to proposals in response to the consultation process or indeed any other emerging evidence, this has been documented within relevant subsequent consultation documents (reflecting the iterative process undertaken during the Regulation 18 Plan Preparation stage).</p>	No
A0440	B001	<p>I ask that the Independent inspector looks at the previous responses to the consultation from Cressage residents. There were many hundreds of objections and it feels these have not been evaluated or assessed fairly by Shropshire Council.</p>	<p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p>	No
A0440	B002	<p>That the number of dwellings be clarified. However I agree with the redevelopment of the former public house to residential and development of the carpark , as long as the footpath is resisted behind the existing building away from the A458, and that the site lines at the junction with Sheinton Road are improved</p>	<p>Noted. Shropshire Council considers that the approximate site capacity specified for site CES006 (around 4 houses) is appropriate. This capacity is considered likely to consist of either 1 resulting from the conversion of the existing building and 3 within the wider site or 2 resulting from the conversion of the existing building and 2 within the wider site, dependent on the nature of development undertaken.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0440	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2(1) CES005	Yes	No	No	<p>1. Firstly the status of Cressage as a potential Community Hub has to be proved to allow for housing development</p> <p>2. Should Hub status be approved it is unclear how many houses are proposed for this site as numbers have varied from 60 – 80 .</p> <p>3. Should Hub status be approved it states that access will be from the A458 providing a footway along the frontage to crossing over A458 to existing footway network east linking into village. A secondary pedestrian and cycling access possible on short frontage to Wood Lane. Speed restrictions positioned south of site with traffic calming measures supporting gateway feature at highway access.</p> <p>4. However this point of access is extremely dangerous as many vehicles, especially lorries and HGVs, exceed the speed limit on this dangerous hill leading south out of the village</p> <p>5. Traffic calming via lights of a roundabout would be necessary in order to prevent major incidents concerning both pedestrians and drivers.</p> <p>6. As the village shop, school, bus stop and surgery are all to the east across the A458 it could be very dangerous with young children, buggies or disability vehicles</p> <p>7. Access to Wood Lane will be very difficult due to the steep gradient and existing housing</p>
A0440	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2(2)	No	No	No	<p>I ask the Inspector to evaluate how and if, Shropshire council evaluated and processed the previous consultation responses. Local reports told of staff shortages within Shropshire Council due to the Covid-19 outbreak and many believe this consultation process was unable to happen thoroughly or fairly. How can nearly 300 responses to previous rounds of consultation be ignored? Why was no feedback or acknowledgement given?. There are four 'Gunning principles' for public consultations, including the stipulation that "there is adequate time for consideration and response". The consultation has not taken into account the restrictions on public involvement because of Covid19 restrictions and it is therefore against government guidelines. A Neighbourhood Plan should be drawn up</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0440	B003	<p>I ask that</p> <ol style="list-style-type: none"> <li>1. The point scoring for allocation Cressage as a Community Hub be looked at again</li> <li>2. IF Hub status is confirmed , that the safety of the access to the site CE S005 be reviewed</li> </ol>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. The identification of proposed allocations were informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways matters with colleagues in the Developing Highways team. Sites have been chosen that will deliver a range of benefits for the community including measures to address the issue of traffic speeding through the speed restricted zones of the village. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community. This will require a suitable scale of development for Cressage and the relatively modest housing guideline figure of 80 dwellings is considered to be appropriate to the size and function of the settlement. The greater proportion of this requirement is to be delivered on site CES005 (60 dwellings) which comprises a relatively flat, open and accessible development opportunity. The design of the development scheme for this site may have a positive impact on the traffic flows through the village. Residents of the proposed development will also have ready access to the principal services in the village particularly through the footway network within the village.</p>	No
A0440	B004	<p>I ask that the Independent inspector looks at the previous responses to the consultation from Cressage residents. There were many hundreds of objections and it feels these have not been evaluated or assessed fairly by Shropshire Council. I ask the inspector to evaluate the consultation process and request that a Neighbourhood Plan be drawn up. I ask that the Independent inspector reviews the Countryside Charity's objections and responses and considers them in depth. I ask the Independent inspector to review Shropshire Councils consultation process during Covid19 and the obvious impacts that has had on preventing people from replying. As evidence for non compliance with consultation, I am using the Draft Statement of Community involvement of the CPRE January 2021</p> <ol style="list-style-type: none"> <li>i) The update of the DSCI should have been carried out some time ago, rather than being left to the last minute in order to tie in with the statutory requirements connected with the Regulation 19 consultation on the Draft Plan.</li> <li>ii) The general principles of consultation in the Gunning principles and in the seven Criteria within Government's own Code of Practice on Consultation should be spelt out within the DSCI.</li> <li>iii) The recent Covid-19 related legislation concerning consultation arrangements should be summarised or referenced in the DSCI.</li> <li>iv) Consultations should be for a minimum of 12 weeks, as recommended by Government. Some Parish Councils do not meet often enough to be able to give due formal consideration to a consultation that is for only 6 weeks.</li> <li>v) Consultations should, as far as possible, avoid holiday periods, or be for a significantly extended period if they do straddle a holiday period.</li> <li>vi) Consultation material should be mainly in electronic form but should not be wholly so; traditional methods should still be used until the County has complete fast broadband cover.</li> <li>vii) The Council should not rely on hard pressed Parish and Town Councils to disseminate consultation material.</li> <li>viii) If a direct choice between multiple options is offered in a consultation the Council should ensure that its policies reflect the results of the poll on those options.</li> <li>ix) Reports on consultations should explain how the Council has arrived at its</li> </ol>	<p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Each stage of consultation has been supported by a proportionate evidence base. Following each of these stages of consultation, a summary of the responses received has been prepared and form appendices to the Consultation Statement prepared for the 'Regulation 19' Pre Submission Draft of the Shropshire Local Plan.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>Where following consultation it has been proposed to make amendments to proposals in response to the consultation process or indeed any other emerging evidence, this has been documented within relevant subsequent consultation documents (reflecting the iterative process undertaken during the Regulation 18 Plan Preparation stage).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0441	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 WHT014	Not Specified	No	Not Specified	Inclusion of land at Liverpool Road, Whitchurch, (WHT014) for the provision of 70 dwellings is unsound for the following reasons:- If this development goes ahead an extra 100 vehicles may use Wrexham Road twice a day during the rush hours. This highway is extremely narrow and due to off street parking is limited to single lane traffic. The consequent stopping, starting and reversing of vehicles causes delays, frustration to motorists and creates much pollution to pedestrians and residents, where dwellings are situated close to the highway, many of which have their ground floors lower than the road. Pollution in the UK exceeds the WHO recommended levels according to research carried out for Asthma UK. Data released by the House of Commons Library states that Whitchurch, Shropshire has the highest rate of Asthma incidents in England with 9.3 per cent of the population registered with this condition compared with a national average of 5.9 per cent.
A0442	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Hadnall	Not Specified	No	Not Specified	The preferred site for the Pre-Submission Draft of the Shropshire Local Plan for Hadnall (Wem area) has identified the site HDL006. I believe that this decision is unsound because there are other sites which are more appropriate as defined in the sustainability appraisal which have scored considerably higher and therefore should be placed as a priority over the site HDL006. For example the chosen site HDL006 has scored -1 where sites HDL0017 and HDL018 have scored +2 and +1 respectively. I also add that due to the scoring being so close, the difference of 3 points in real terms is statistically significant, and should as such be apportioned appropriately. Appraisal scores identified the "Range" of scores green colour code as a positive and white as zero, with amber being given with a negative score. Again how can a negative amber site have precedence over a green positive score site? This decision is not sound.
A0443	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0443	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0443	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0441	B001	Remove the Liverpool Road Site (WHT014) due to the very serious risk of increasing pollution levels to Wrexham Road (A525). All the other sites detailed in schedule18(1) Residential Allocations for Whitchurch plus the SAMDEV Plan Site allocations have access to highways where the traffic movement is more amenable to an increase.	Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0442	B001	The sustainability Appraisal has scored several sites higher than the chosen preferred site of HDL006. The requirements for selection of a site include the requirement that a landowner has expressed an intention to develop and or sell land for this purpose. Two sites which have scored higher HDL017 and HDL018 have been part of the landowners (Sansaw Estate) proposal for "a vision for the future" for Hadnall. This proposal secures a blueprint for the future in a structured and phased approach which future proofs any and all future developmental requirements for many years to come. Not just for this current local plan, but also the next and future generation of local plans. One plan, one strategy, one future.....one highly professional sustainable approach. HDL017 and or HDL018 should be the preferred chosen site for the Hadnall local plan.	Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement. The scores outlined in the SA are not the determining factor when deciding on a preferred site for allocation. Rather, it is a combination of many more factors, which includes expertise from those in areas such as Highways, Ecology, Public Protection etc. to ultimately determine the most appropriate site for an allocation.	No
A0443	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0443	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0443	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No

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A0443	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth.</p> <p>Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0443	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>
A0444	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18	Not Specified	No	Not Specified	<p>There are just two short paragraphs addressing air quality impacts from proposed development which recommend proportionate assessment should be undertaken. However this policy does not differentiate between the range of potential air quality concerns and impacts that developments may give rise to. I have been researching intensive poultry units and major air pollution concerns include odour, ammonia, particulate matter, diesel emissions from HGVs, or other noxious air borne emissions generated by such agricultural processes as described in the government Clean Air Strategy or EA air pollution publications. Concerns here include the impacts on biodiversity and also effects on people’s health and amenity in the vicinity. The document treats air pollution as if it was a singular phenomenon, whereas in fact it is more complex than noise pollution or light pollution both of which are given more space in this section of the plan. There is also no reference (unlike in paragraphs 7 &amp; 8 on noise) to guidance documents such as the Council’s own ammonia emissions guidance or industry guidance on the assessment of odour for planning published by the Institute of Air Quality Management in 2018. A proposed development such as an IPU may require several different air quality assessments. They also need to take into account cumulative effects of existing operations, including any just over county boundaries. Paragraph 2.27 of the HRA document states intensive livestock units may pollute sites up to 10km away. Paragraph 2.28 implies the council does not know where all these facilities currently are, which seems very worrying and would also imply that cumulative impacts could not be assessed effectively. I am aware of a number of planning applications where cumulative impacts of other IPUs very close by have been ignored/omitted and this wording does not give confidence that this will be addressed in future.</p>
A0444	B002	Habitats Regulations Assessment	Habitats Regulations Assessment Table 1	Not Specified	No	Not Specified	<p>Table 1 pages 10-11 of the HRA Assessment omits significant impact pathways for air pollution and hydrological impacts.</p> <p>Nitrogen oxide, sulphur oxide and particulate matter are mentioned as being caused by residential and industrial combustion processes. This omits the fact that many intensive livestock units are significant sources of nitrogen oxides and particulate matter. There does not need to be a combustion process involved for there to be pollution from such chemicals and matter.</p> <p>The following point in the table does mention ILUs in connection with ammonia and thus gives the impression that this is the only source of air pollution of concern from such units. Under hydrological impacts there is no reference to agricultural pollution and no reference to surface water pollution from agriculture. The latest apportionment of phosphate sources could I am sure be checked (in the river wye catchment EA estimates it is 66% from agriculture) which should justify being more specific about the risks from inappropriate and excess manure spreading and disposal of manure from the increasing numbers of intensive livestock units being given planning permission. There are currently over 16 million chickens in Shropshire at any one time, plus 6 million collectively in the Severn and Teme catchments in Powys, and 600,000 in the Herefordshire Teme catchment, plus other types of livestock. Inadequate oversight of how the additional volumes of manure is being used creates a huge risk for eutrophication of the county’s waterways and loss of biodiversity. This is a planning issue as there are more applications ongoing and manure impacts have been found to be planning matters in a recent legal case about the Tasley application. The omissions are particularly surprising when seen alongside the long list of recreational and disturbance risks which I would have thought would largely be much less extensive and serious.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0443	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0443	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0444	B001	Council officers expert in air quality issues, should review the wording and add more detail to cover the issues identified, to the same level of detail as other pollution effects. In particular odour should be identified separately. The fact that air quality raises concerns about environmental, health and amenity impacts should be noted. 'Cumulative' should either be spelt out more specifically or a cross reference included to where cumulative impacts are defined elsewhere in the plan.	The Council considers that the requirements and level of detail of this policy are consistent with national planning policy and guidance and that as such, the proposed amendments are not necessary. No change proposed.	No
A0444	B002	Additional analysis and wording about air pollution and hydrological impacts from agricultural sources to clarify the pathways missing from the table and then in further detail in the text below.	The HRA evaluates the likely impacts from the development proposed by the Plan on internationally protected sites. Whilst the pathways described in the response are accurate, they mainly relate to agricultural activities which the Plan does not regulate. Policy DP12 provides for a project level HRA where agricultural activities require planning permission. No change proposed.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0445	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>Policy SP2 states that growth opportunities in rural areas should be closely aligned with the ability of villages to provide a suitable standard of services and facilities. In order to ensure this the Council stated that it would apply a consistent methodology for the identification of Community Hubs, assessed through the Hierarchy of Settlements document. The policy identifies Community Hubs as significant rural service centres but it is unsound in its application as it is not based on up to date or accurate evidence and the treatment of changes to local services and facilities throughout the Plan's development has been inconsistent. The Hierarchy of Settlements (August 2020) supports the Local Plan Review and Policy SP2, by setting out the methodology for identifying Shropshire's service centres. This is to provide Policy SP2 with specific and consistent criteria about Shropshire's settlements and their sustainability. Para 2.6 of the August 2020 version of the Hierarchy of Settlements states the need to keep this evidence up to date with best available information about changing local facilities, services and infrastructure, including feedback from previous consultation on the Local Plan Review and informal consultation with representatives of the local communities. However, despite consultation responses highlighting changing evidence on the availability of local facilities in some of Shropshire's settlements, including the most recent Regulation 18: Pre- Submission Draft of the Local Plan (August 2020- September 2020), Policy SP2 does not take these into account. Previous formal and informal consultations on the Local Plan Review have repeatedly highlighted the misidentification of available local services for the village of Clive. However Clive remains under Policy SP2 as a Community Hub and deemed a 'significant rural service centre' but without the actual presence of the necessary associated services and facilities to support this. This raises significant concerns about the soundness of the application of the Hierarchy of Settlements evidence base in the development of the Regulation 19 Plan and the application of a consistent approach cross the whole of the Plan area. For example, the village of Myddle, like Clive, was initially identified as a Community Hub but following closure of the local convenience store in summer 2018, the evidence base was reviewed and it was determined that the village fell below the threshold to be considered a 'significant rural service centre'. The same consistent application of this methodology has not been applied to the village of Clive, despite falling under comparative circumstances with a closure of a local convenience store. The village thereby also falls below the threshold for a Community Hub. This was raised with Shropshire Council by the Parish Council, local residents and indeed the shop owner during the Regulation 18 consultation stage but the Regulation 19 Plan remains unchanged, rendering Policy S2.2 unsound as it is not justified and based upon out of date evidence.</p>
A0445	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	Yes	Not Specified	<p>Policy SP7 recognises the importance of the residential guidelines for settlements, set out in Policies S1- S20 as an important policy consideration in managing future developments. It reflects the importance of settlement policy boundaries in strictly controlling development. This Policy is consistent with the Shropshire Test set out in Policy SP1 and the Strategic Approach in Policy SP2 which together support the NPPFs approach to significantly boosting housing supply whilst reflecting the unique character across Shropshire's urban and rural settlements through appropriate application and distribution of development across a settlement hierarchy. Removal of development boundaries or flexible application of the housing guidelines as a minimum could lead to uncontrolled and unsustainable development thereby conflicting with other policies within the Plan.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0445	B001	Policy SP2 should remove reference to Clive as Community Hub as current evidence on availability and accessibility of local facilities and services means it does not meet the definition of a significant rural service centre as defined by the Hierarchy of Settlements evidence base and subsequent Local Plan policies.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0445	B002	n/a	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0445	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	Evidence in HoS is inaccurate. Clive's bowling green and local convenience store are available to the community – both have closed. Clive has been treated different to other settlements, such as Myddle and Cockshutt and Westbury where changes have been taken into account in the scoring. Revisions to the Hierarchy of Settlements evidence base over the Plan development has led to relaxation around the requirement for Community Hubs to have employment and peak time public transport, which should be fundamental to the determination of 'significant rural service centres'. As a result, there are now inconsistencies in the policy, with the definition of Community Hubs continuing to be set out as 'settlements considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities' but the assessment criteria and associated threshold no longer require such facilities to be present. This is illustrated by the example of Clive which when assessed clearly doesn't meet the criteria for a Community Hub in that there is a reliance upon other settlements to meet day to day needs such as employment and local convenience goods. The Plan and Policy SP8 is therefore considered to be unsound as the methodology and application of associated evidence does not meet the intended definition of a Community Hub and the overall settlement hierarchy needed to maintain sustainability and is therefore not justified.
A0445	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	Not Specified	No	Not Specified	Although Policy SP15 provides a framework for a long term vision of estate land within Shropshire, it is considered to be unsound because it does not recognise its relationship to other policies in the Plan and does not set out a framework for how this Policy relates to other policies in the Plan. It is therefore not considered effective. This Policy needs to be clear on the relationship between other rural settlements in the Plan, particularly Community Hubs. Without being specific on the relationship to Policy SP8, the Policy provides no framework for development for rural areas and poses the risk of the spreading and merging of development between the defined development boundaries of Community Hubs and neighbouring estate land. This would significantly increase housing numbers beyond the housing guideline for these settlements which has been set and consulted upon as the most appropriate on sustainability and character grounds. The Policy needs to reflect the distinction between Community Hubs and Estate Land to ensure these policies work in harmony and do not result in inappropriate rural development.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0445	B003	Policy SP8 should remove reference to Clive as Community Hub as current evidence means it does not meet the definition of a significant rural service centre as defined by the Local Plan Review	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0445	B004	Policy SP15 should explicitly reflect the relationship to Policies SP8, making clear that any land within whole estate plans falling within defined Community Hubs or Clusters needs to be consistent with the relevant settlement policy requirements and those of SP7 in relation to housing guidelines and development boundaries.	<p>Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal.</p> <p>Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0445	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2	Not Specified	No	Not Specified	S17 is unsound as SP8 and SP2 are unsound. SP17.2 is based on inaccurate and out of date evidence. The HoS scoring is incorrect (bowling green and shop). Clive has been treated differently to other settlements in such situations such as Cockshutt, Myddle and Westbury where updates have been made to reflect reality.
A0446	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	Policy SP2 states that growth opportunities in rural areas should be closely aligned with the ability of villages to provide a suitable standard of services and facilities. In order to ensure this the Council stated that it would apply a consistent methodology for the identification of Community Hubs, assessed through the Hierarchy of Settlements document. The policy identifies Community Hubs as significant rural service centres but it is unsound in its application as it is not based on up to date or accurate evidence and the treatment of changes to local services and facilities throughout the Plan's development has been inconsistent. The Hierarchy of Settlements (August 2020) supports the Local Plan Review and Policy SP2, by setting out the methodology for identifying Shropshire's service centres. This is to provide Policy SP2 with specific and consistent criteria about Shropshire's settlements and their sustainability. Para 2.6 of the August 2020 version of the Hierarchy of Settlements states the need to keep this evidence up to date with best available information about changing local facilities, services and infrastructure, including feedback from previous consultation on the Local Plan Review and informal consultation with representatives of the local communities. However, despite consultation responses highlighting changing evidence on the availability of local facilities in some of Shropshire's settlements, including the most recent Regulation 18: Pre-Submission Draft of the Local Plan (August 2020- September 2020), Policy SP2 does not take these into account. Previous formal and informal consultations on the Local Plan Review have repeatedly highlighted the misidentification of available local services for the village of Clive. However Clive remains under Policy SP2 as a Community Hub and deemed a 'significant rural service centre' but without the actual presence of the necessary associated services and facilities to support this. This raises significant concerns about the soundness of the application of the Hierarchy of Settlements evidence base in the development of the Regulation 19 Plan and the application of a consistent approach cross the whole of the Plan area. For example, the village of Myddle, like Clive, was initially identified as a Community Hub but following closure of the local convenience store in summer 2018, the evidence base was reviewed and it was determined that the village fell below the threshold to be considered a 'significant rural service centre'. The same consistent application of this methodology has not been applied to the village of Clive, despite falling under comparative circumstances with a closure of a local convenience store. The village thereby also falls below the threshold for a Community Hub. This was raised with Shropshire Council by the Parish Council, local residents and indeed the shop owner during the Regulation 18 consultation stage but the Regulation 19 Plan remains unchanged, rendering Policy S2.2 unsound as it is not justified and based upon out of date evidence.



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A0445	B005	Policy SP17.2 should remove reference to Clive as Community Hub as current evidence on availability and accessibility of local facilities and services means it does not meet the definition of a significant rural service centre as defined by the Hierarchy of Settlements evidence base and subsequent Local Plan policies.	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0446	B001	Policy SP2 should remove reference to Clive as Community Hub as current evidence on availability and accessibility of local facilities and services means it does not meet the definition of a significant rural service centre as defined by the Hierarchy of Settlements evidence base and subsequent Local Plan policies.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0446	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	Yes	Not Specified	Policy SP7 recognises the importance of the residential guidelines for settlements, set out in Policies S1- S20 as an important policy consideration in managing future developments. It reflects the importance of settlement policy boundaries in strictly controlling development. This Policy is consistent with the Shropshire Test set out in Policy SP1 and the Strategic Approach in Policy SP2 which together support the NPPFs approach to significantly boosting housing supply whilst reflecting the unique character across Shropshire's urban and rural settlements through appropriate application and distribution of development across a settlement hierarchy. Removal of development boundaries or flexible application of the housing guidelines as a minimum could lead to uncontrolled and unsustainable development thereby conflicting with other policies within the Plan.
A0446	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	Evidence in HoS is inaccurate. Clive's bowling green and local convenience store are available to the community – both have closed. Clive has been treated different to other settlements, such as Myddle and Cockshutt and Westbury where changes have been taken into account in the scoring. Revisions to the Hierarchy of Settlements evidence base over the Plan development has led to relaxation around the requirement for Community Hubs to have employment and peak time public transport, which should be fundamental to the determination of 'significant rural service centres'. As a result, there are now inconsistencies in the policy, with the definition of Community Hubs continuing to be set out as 'settlements considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities' but the assessment criteria and associated threshold no longer require such facilities to be present. This is illustrated by the example of Clive which when assessed clearly doesn't meet the criteria for a Community Hub in that there is a reliance upon other settlements to meet day to day needs such as employment and local convenience goods. The Plan and Policy SP8 is therefore considered to be unsound as the methodology and application of associated evidence does not meet the intended definition of a Community Hub and the overall settlement hierarchy needed to maintain sustainability and is therefore not justified.
A0446	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	Not Specified	No	Not Specified	Although Policy SP15 provides a framework for a long term vision of estate land within Shropshire, it is considered to be unsound because it does not recognise its relationship to other policies in the Plan and does not set out a framework for how this Policy relates to other policies in the Plan. It is therefore not considered effective. This Policy needs to be clear on the relationship between other rural settlements in the Plan, particularly Community Hubs. Without being specific on the relationship to Policy SP8, the Policy provides no framework for development for rural areas and poses the risk of the spreading and merging of development between the defined development boundaries of Community Hubs and neighbouring estate land. This would significantly increase housing numbers beyond the housing guideline for these settlements which has been set and consulted upon as the most appropriate on sustainability and character grounds. The Policy needs to reflect the distinction between Community Hubs and Estate Land to ensure these policies work in harmony and do not result in inappropriate rural development.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0446	B002	n/a	Noted.	No
A0446	B003	Policy SP8 should remove reference to Clive as Community Hub as current evidence means it does not meet the definition of a significant rural service centre as defined by the Local Plan Review	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0446	B004	Policy SP15 should explicitly reflect the relationship to Policies SP8, making clear that any land within whole estate plans falling within defined Community Hubs or Clusters needs to be consistent with the relevant settlement policy requirements and those of SP7 in relation to housing guidelines and development boundaries.	<p>Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal.</p> <p>Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.</p>	No

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A0446	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2	Not Specified	No	Not Specified	SP17 is unsound as SP8 and SP2 are unsound. SP17.2 is based on inaccurate and out of date evidence. The HoS scoring is incorrect (bowling green and shop). Clive has been treated differently to other settlements in such situations such as Cockshutt, Myddle and Westbury where updates have been made to reflect reality.
A0447	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix: Hierarchy of Settlements	Yes	No	Yes	HoS methodology is having a detrimental effect on sustainability of rural villages by incentivising service closure - it does not meet the test of soundness as it is inconsistent with national policy and fails NPPF para 83d. In direct opposition to the retention of community facilities, before the plan has even been adopted, it has led to the loss of community facilities and created an impediment to new ones in some rural Shropshire villages. It has led to an incentive for rural communities to close services in order to avoid large scale development. Residents of Clive are prepared to lose services to avoid house building.
A0447	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Clive	Yes	No	Yes	Objectively plots CLV012/018 provide fewer benefits to the village than plot CLV010. Therefore the plan is not sound as it is not justified. The reasoning behind changing sites is factually incorrect or not significant. CLV010 is a better site.
A0448	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S9.1 Highley, DP18	No	No	No	Public meetings were attended regarding this site and minutes were taken but I have not seen these, and I do not believe that they were recorded. Such meetings were officers paying lip services to the consultation, despite extremely strong local opposition to the site. The site was deemed in 2002 as being unsuitable for fences, hedges and walls. Poor access to the site on a dangerous bend. The mental health of residents will be affected. There are alternative sites which are preferred locally. The consultation has not been fair or transparent. Villagers are considering a judicial review however the council appear to have ignore their letters which shows a lack of respect and muscle flexing.
A0449	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0446	B005	Policy SP17.2 should remove reference to Clive as Community Hub as current evidence on availability and accessibility of local facilities and services means it does not meet the definition of a significant rural service centre as defined by the Hierarchy of Settlements evidence base and subsequent Local Plan policies.	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0447	B001	There is no way to undo the damage already done to villages where an amenity has already been voluntarily lost in the consultation stages of the plan. If not entirely rejected, the plan should be modified to remove the explicit link between the scale of development and services. This would at least avoid further damage to villages near the points boundaries, which without the modification will continue to resist any new service opportunities, or intentionally plan the loss of services prior to the ongoing 5 yearly review.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire.</p>	No
A0447	B002	Modification to change preferred plot to CLV010.	Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement	No
A0448	B001	Replace site HNN016 with alternative suggested by Mr Unitt (another respondent).	<p>Shropshire Council considers that the proposed development strategy for Highley and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>	No
A0449	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0449	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0449	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0449	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0449	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0449	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0449	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0449	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0449	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0450	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	No	Not Specified	<p>Demographic-based projections produced by the SHMA fail to consider the full picture and do not accurately reflect market demand, this should be recognised in DP1.</p> <p>Do not consider the Right Home Right Place process has a robust method for determining the housing mix of 50% of dwellings on a site. It is not clear what justification there is for setting these requirements.</p> <p>Justification for the housing mix of 50% of dwellings specified in circumstances where there is no Right Home Right Place is unclear and does not correlate with the SHMA.</p> <p>The need for higher accessibility, adaptability and wheelchair housing standards is addressed at paragraphs 6.267 – 6.294 of the SHMA. However, the evidence does not appear to support the proposed requirement for 70% of all new dwellings to meet M4(2) standard. The proposed policy is inconsistent with the NPPG, which is clear that the requirement for wheelchair accessible homes (i.e. M4(3) standard) should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (i.e. certain types of affordable housing).</p> <p>The policy states that ‘a range’ of specialist housing will be provided, but it does not specify how much specialist housing that entails on an individual proposal. But in any event, achieving ‘a range’ of specialist housing on many sites of less than 200-250 dwellings would be extremely challenging. Most sites within the range of 50-250 dwellings would be acquired and developed by a single developer, which would be unlikely to be able to deliver specialist housing such as a care home or extra care accommodation.</p>
A0450	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Not Specified	No	Not Specified	<p>Object to the requirement at part 2 of draft Policy DP2 for all sites of 10 or more dwellings to provide 10% of houses as serviced plots for self-build, as a need has not been demonstrated for this type and scale of provision. Table 131 of the SHMA suggests that around 2,390 applications will be made for inclusion on the Self-Build Register during the plan period. However, the evidence at tables 132 and 133 of the SHMA shows that the supply of such units is exceeding additions to the Self-Build Register.</p> <p>Without prejudice to our in-principle concerns, the draft policy also contains a requirement to market plots for 36 months at a ‘fair plot valuation’. Do not consider this to be a reasonable timeframe for marketing the site, as if there is an immediate need then we would expect the plot to require only a very limited marketing period.</p>
A0450	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	No	Not Specified	<p>The policy sets a requirement for 10% in the north and 20% in the south. The figure for the south does not appear to be supported by the Viability Study. We are not aware that landowners have been contacted or have confirmed that 20% is deliverable. It should be noted that this could also have implications for existing allocations.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0450	B001	<p>Draft Policy DP1 should be amended to:</p> <ul style="list-style-type: none"> <li>-Make clear the dwelling mix set out in the SHMA is a starting point only, and to be applied flexibly, reflecting local needs and market demand.</li> <li>-Amended the housing mix to state that, where appropriate, residential development will be expected to provide a mix of dwelling sizes, types and tenures in order to meet the identified needs of local communities, having regard to evidence from the SHMA, market demand and any other local evidence (including the Council's Right Home Right Place survey).</li> <li>-With regard to M4(2) housing, the evidence and policy should be reviewed, and more realistic assumptions applied.</li> <li>-With regard to M4(3) housing, the policy needs to make clear that the 5% requirement only applies to the element of affordable housing.</li> </ul>	<p>Noted. Shropshire Council considers the proposed requirements of draft Policy DP1 positively respond to the housing need evidence within the Strategic Housing Market Assessment (SHMA), which is considered a robust and proportionate evidence base for informing policies on housing need. It also positively responds to housing need evidence arising from the Right Home Right Place Surveys, which are considered an appropriate means of identifying housing need within communities.</p> <p>With regard to the bedroom size mix, it is considered para's 2a/b of draft Policy DP1 provide an appropriate balance between ensuring new development includes an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) about housing mix requirements, and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factors as site specific characteristics, local need and market demand.</p> <p>The housing mix proposed within para 2b of draft Policy DP1 is informed by the SHMA, which indicates a significant proportion of new dwellings required during the proposed Plan period will be 1, 2 and 3 bedrooms in size. Specifically, the SHMA indicates around 32.7% of the dwellings needed will be 1 or 2 bedrooms in size and a further 43.5% will be 3 bedrooms in size. This demand for 1, 2 and 3 bedroom dwellings also reflects the view often expressed by local communities when discussing their local housing needs.</p> <p>With regard to M4(2) and M4(3) housing, the SHMA identifies that growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the Local Plan period from 2016 to 2038. It calculates a total need for M4(2) and M4(3) housing equivalent to 77% of total household growth (of which M4(3) constitutes around 13%). It is recognised that part of this need can be met within specialist accommodation, however Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible. As such Shropshire Council considers the SHMA justifies the proposed thresholds for M4(2) and M4(3) standard dwellings.</p> <p>With regard to M4(3) housing, it is acknowledged that NPPG stipulates Local Authorities should only require wheelchair accessible homes for those dwellings they are responsible for allocating/nominating a person to live in that dwelling. The explanation to draft Policy DP1 states in paras 4.33 and 4.34 "It should be noted that M4(3) (wheelchair user dwellings) standard within Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings. Where dwellings are required to meet M4(3) (wheelchair user dwellings) standard within Building Regulations to comply with this policy, they will normally consist of wheelchair adaptable homes. Wheelchair accessible homes will only be required where Shropshire Council is responsible for nominating a person to live in the dwelling."</p>	No
A0450	B002	n/a	<p>Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position.</p> <p>Draft Policy DP2 includes a 24 month marketing timescale, which is considered appropriate.</p>	No
A0450	B003	We consider that the requirement for larger sites in the south of the borough should be reduced to a level that is demonstrably viable.	Noted. Shropshire Council considers that the proposed affordable housing contributions are appropriate. They respond to the significant affordable housing need identified in Shropshire and best available information on development viability, from within the Shropshire Viability Study.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0450	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	No	Not Specified	Parts 1(b), 1(c) and 1(d) of Policy DP11 are inconsistent with national planning policy and guidance, which makes clear that the only additional technical requirements exceeding the minimum standards required by Building Regulations that can be sought are the optional technical standards as detailed in the NPPG. These elements of the policy should therefore be deleted.
A0450	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Not Specified	No	Not Specified	Policy DP12(3) requires all developments to 'achieve a 10% net gain in biodiversity in accordance with the Environment Act'. However, the provisions of the Environment Act relating to biodiversity net gain (BNG) have only been consulted upon (numerous objections have been raised) and at this point there is no certainty that it will be carried forward into law. The Framework sets out a requirement at paragraph 170(d) for planning policies and decisions to contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. Therefore, to be consistent with national planning policy the draft plan should specify that development should achieve a BNG. There is no justification for the figure to be 10%. We are also concerned as to whether the Council has fully assessed the implications of applying 10% BNG on development within Shropshire, including the impact upon the developable areas of site allocations, and potentially development yield. It is not clear how the Council's assumptions in the Viability Study for achieving a 10% BNG have been derived.
A0451	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 SHR173	Not Specified	No	Yes	The draft Local Plan S16 Shrewsbury Place Plan Area cites that SHR173 Land west of Ellesmere Road, Shrewsbury is allocated for housing (approx. 450) and that: "the delivery of this development is directly dependent on the approval and construction of the North West Relief Road." S16.1 Development Strategy: Shrewsbury Strategic Centre para. 7 states that "the delivery of the North West Relief Road (NWRR) is supported in principle" However at this stage only a scoping opinion has been issued therefore without supporting evidence the Plan should not support the NWRR 'in principle' and allocate a housing site solely on the basis of the approval of the road. In addition, the policy goes on to say that the "...development of this site will be in accordance with a Masterplan which will need to reflect the objectives of the Big Town Plan and any related masterplans..." It should be noted that the Big Town Plan is also currently under public consultation and therefore subject to change.
A0452	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S12.1 PON040	Not Specified	Not Specified	Not Specified	Regulation 19: Pre-Submission Draft of the Policies Map S12-minsterley-pontesbury-place-plan-area-insetmaps.pdf Pontesbury Map Development Boundary Line adjacent to PONO40 is unsound & Sustainability Assessment <a href="https://shropshire.gov.uk/media/16792/sustainability-appraisal-appendix-mminsterley-and-pontesbury-place-plan-area-site-assessments.pdf">https://shropshire.gov.uk/media/16792/sustainability-appraisal-appendix-mminsterley-and-pontesbury-place-plan-area-site-assessments.pdf</a> for PON040 is unsound. There are many anomalies. Neither reflect the facts on the ground, or available evidence. They do not comply with paragraph 35 of the National Planning Policy Framework (NPPF) Test b. Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence
A0453	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 SHF015, SHF029	Yes	Yes	Yes	n/a
A0454	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 HDL006	Yes	Yes	Yes	n/a



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0450	B004	The parts referred to should be deleted	<p>Subsection 1 (a) of the 2008 Planning and Energy Act states that Local Planning Authorities may include policies imposing reasonable requirements for 'a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development', provided these are consistent with national policy. National policy is the 2015 Written Ministerial Statement which allows Local Planning Authorities to set Code for Sustainable Homes level 4 energy standards. The policy reflects this standard. No change proposed.</p> <p>Although the government announced its intention to amend Subsection 1 (c) of the 2008 Planning and Energy Act in 2015 - which states that Local Planning Authorities may include policies imposing reasonable requirements for 'development in their area to comply with energy efficiency standards that exceed the energy requirements of the building regulations' - these amendments have not yet been enacted. The intention of the amendment was to introduce higher energy performance requirements through building regulations, rather than the planning system. The performance increase was expected to be a 19% improvement. This improvement is also referenced in national policy through the 2015 Written Ministerial Statement - being equivalent to the Code for Sustainable Homes level 4 energy criteria which the Statement permits. However, the government's 2015 Productivity Plan subsequently stated that 'the government does not intend to proceed with .....the proposed increase in on-site energy efficiency standards, but will keep energy efficiency standards under review recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.' Recent government consultations on the Future Homes Standard and Future Buildings Standard indicate that such a review is ongoing with the outcome forming part of changes to Part L of the Building Regulations. However, these changes have not yet been made. Thus the Council believes that the powers afforded to LPAs through the 2008 Planning and Energy Act to set energy efficiency standards in new homes still exist and that this policy's requirements are appropriate. Provision is also made in the policy for higher Building Regulations standards to apply if/when these are implemented. No change proposed.</p>	No
A0450	B005	To be consistent with national planning policy the draft plan should specify that development should achieve a BNG	The Queens Speech of 11th May 2021 indicated Government's intention to introduce the Environment Bill in the upcoming Parliamentary year. The key element of the Environment Bill is at least 10% biodiversity net gain. The Council is confident that this will be carried forward into law and that it is appropriate to include it in Policy DP12 to give clarity to developers, communities and the decision maker on requirements. Therefore no amendment is proposed.	No
A0451	B001	Removal of housing site SHR173 from the Shropshire Local Plan	Noted . it is considered the proposed allocation of SHR 173 has been through a robust site assessment process and represents a sustainable option for the town's growth. No change proposed	No
A0452	B001	<p>1) Add site PON040 to Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038 - to S12 Community Hub Schedule S12.1(i) p234 by amending this box: Land at Minsterley Road, Pontesbury (PON008, PON017 and PON030 AND PON040)</p> <p>2) At the very least Add site PON040 to the LONG TERM POTENTIAL SLAA RESIDENTIAL SITES allocation.</p> <p>3) Modify the Development Boundary Line for Pontesbury so that &gt;40 years existing 1&amp;2 Hinton Lane are correctly shown as inside the Development Boundary.</p>	Shropshire Council have undertaken a robust assessment of all of the promoted sites and consider the approach taken to the preferred allocations and Development Boundaries as being reasonable and appropriate for the Local Plan.	No
A0453	B001	n/a	Shropshire Council welcomes the intention to attend the proposed Examination to support the proposed allocation of sites SHF015 and SHF029 for housing development in Shifnal in the period to 2038 as evidence of the soundness of the Local Plan.	No
A0454	B001	n/a	n/a	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0455	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S19 Clive Barracks, Tern Hill	Yes	Yes	Yes	<p>Support proposed allocation of Clive Barracks, Tern Hill. The site forms part of the Ministry of Defence (MOD) commitment to provide land for 55,000 dwellings and has been identified for release by the MOD as part of the Better Defence Estate Strategy (vacated and available from 2025). Whilst development cannot commence until 2025, allocation is essential to provide confidence to continue preparatory works and site disposal exercises ahead of vacation. This lead-in time is normal on strategic sites and will assist in ensuring expedited delivery once on-site operations can commence.</p> <p>Redevelopment for new homes and employment generating uses will contribute towards Shropshire's housing &amp; employment needs through the effective re-use of a predominantly brownfield site, which is encouraged throughout national policies and guidance.</p> <p>Site promoter remains fully committed to delivery of housing &amp; employment at Clive Barracks and recognise the role of the site in the delivery of housing during the Local Plan Review plan period and beyond.</p> <p>A suite of technical evidence has been prepared by the site promoter to confirm suitability and deliverability of the site for a residential led mixed-use development. Representation identifies assessments undertaken. This evidence and workshops undertaken by the Clive Barracks Task Force have informed an indicative masterplan for the site which illustrates how approximately 750 dwellings and 5.75 hectares of employment land can be accommodated - copy of the indicative masterplan reproduced within representation. Shropshire Council evidence also addresses this site.</p> <p>Allocation of Clive Barracks, Tern Hill entirely conforms with the National Planning Policy Framework (NPPF), despite not being immediately available. Para 22 of the NPPF sets out the need for policies to look ahead 15 years from adoption to anticipate/respond to long-term requirements and opportunities. Para 67 of the NPPF states strategic policy-making authorities should have a clear understanding of available land in their area and planning policies should identify...specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan. Para 72 of the NPPF states the "supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements".</p> <p>Allocation of Clive Barracks, Tern Hill is also in accordance with the Economic Growth Strategy for Shropshire which seeks to prioritise investment in strategic locations along strategic corridors, such as the A41 on which Clive Barracks, Tern Hill is located.</p> <p>Part 3 of draft Policy S19 requires preparation of a comprehensive Masterplan for the site, to be adopted by Shropshire Council. This requirement is recognised and supported. Committed to ongoing engagement with the Council and Clive Barracks Task Force Group in working up the masterplan.</p> <p>Comments on proposed guidelines which the masterplan/development will confirm with, identified within Part 3 of draft Policy S19, are:</p> <p>Criteria A and B. Quantity of development (750 dwellings, accommodating a mix of housing types and 5.75ha of employment land) that can be accommodated on the site has been informed by the site specific technical evidence prepared. Committed to working with the Council to ensure that the employment generating opportunities at Clive Barracks reflect local need, market demands and the aspirations of the Economic Growth Strategy for Shropshire. Site Guidelines which seek employment generating uses on the site and provide flexibility rather than a prescriptive approach to deliver the best possible employment offer for the site are supported.</p> <p>Criteria C. Nature/phasing of local centre confirmed at Planning Application stage. Proposed local centre will benefit residents on the site, living in the area and passing on the A41, as noted by local residents responding to previous consultations.</p> <p>Criteria D. To provide certainty, consider the "appropriate quantity" of Green Infrastructure needs to be defined. Illustrative Masterplan shows a range of types of open space (which also buffers environmental assets) totalling around 4.4ha. Areas of woodland within the site (including their buffers) extend this to approximately 17.8 ha in total. High-quality scheme can be delivered under those parameters.</p>
A0455	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	Yes	Yes	<p>Proposed strategic approach, which aims to see Shropshire flourish, with new development that meets its needs, makes settlements more sustainable and seeks to deliver a strategy of economic growth and improvement is supported and considered in line with the National Planning Policy Framework (NPPF) and associated guidance. It also proposes to significantly boost housing supply and meet unmet needs arising in neighbouring areas and is therefore sound and in accordance with the Duty to Cooperate.</p> <p>Proposed housing requirement is in full accordance with up to date guidance on setting a sound and robust housing requirement. Also support the Council's position in para 3.6 regarding the housing requirement meeting need, but also providing flexibility in the supply and achieving other identified opportunities.</p> <p>Recent changes to the standard methodology for calculating local housing need do not directly impact on Shropshire but do impact on the wider region (35% increase for Wolverhampton and Birmingham, which already have significant unmet need). Government proposals for additional financial support for these areas and changes to Permitted Development rights/evolving nature of town centres following Covid 19 will create further opportunities for housing delivery, however, unmet need in these areas will increase. Shropshire can absorb additional unmet need within its proposed housing strategy, providing further assistance to the wider region.</p> <p>Welcome commitment to keeping availability of land (both for housing and employment) 'under review', this is critical particularly for housing.</p> <p>Support identification of Clive Barracks, Tern Hill as a strategic settlement. It will form a successful, sustainable and well-designed new community delivering an appropriate mix of housing, employment opportunities and local services and facilities to serve existing and future residents, as well as the necessary infrastructure to deliver a sustainable and safe development. Allocating sites that will deliver in the medium/long term, such as this, is a crucial component of supply to achieve consistent housing delivery throughout the proposed Plan period and beyond.</p> <p>Whilst general principles of draft Policy SP2 are supported, it should make specific reference to delivery of suitable Brownfield land. NPPF states planning policies and decisions should give substantial weight to the value of using suitable brownfield land for homes or other identified needs and such sites must be prioritised by spatial, strategic policies. Recognise a number of brownfield sites are proposed for allocation, however the overarching strategy fails to make clear the advantages of the delivery of these sites as part of the overall strategic approach.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0455	B001	<p>Site Guidelines which seek employment generating uses on the site and provide flexibility rather than a prescriptive approach to deliver the best possible employment offer for the site are supported.</p> <p>To provide certainty in delivering the proposed development at Clive Barracks it is considered that the “appropriate quantity” of Green Infrastructure needs to be defined. A Plan detailing MOD safeguarding zones is included at Appendix 1 and should be referenced within the draft Policy. Further explanation should be provided on this requirement.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole.</p> <p>It is considered that the proposed site guidelines for Clive Barracks, Tern Hill, alongside other relevant policies relating to employment provision (including SP12, SP13 and SP14), provide a flexible approach to employment provision on the site, which allows this provision to positively respond to local need, market demands and the aspirations of the Economic Growth Strategy.</p> <p>It is considered that the proposed site guidelines for Clive Barracks, Tern Hill, alongside other relevant open space and green infrastructure policies (including DP13 and DP15) provide clarity on what is considered an appropriate quantity of green infrastructure provision for the site.</p> <p>A map illustrating MOD safeguarding zones, as provided by the MOD, forms part of the evidence base for the draft Shropshire Local Plan and forms a consideration within the Planning Application process. The specific approach to the design and layout, dimensions of structures and materials used within any development of Clive Barracks, Tern Hill, to ensure it does not impede operation of the adjacent airfield and associated transmitter/receiver facilities will be determined through the Planning Application process, which can of course be informed by consultation with the MOD. As such it is considered sufficient certainty exists on this matter whilst also recognising the strategic nature of the draft Shropshire Local Plan.</p>	No
A0455	B002	<p>Include specific reference to the advantages of delivering brownfield land.</p>	<p>General support for draft Policy SP2 noted.</p> <p>With regard to brownfield land, the strategic approach includes an urban focus, by which the majority of development is directed to urban areas, which are also the locations where the majority of appropriate brownfield sites are located. Furthermore, where appropriate, brownfield sites, including large brownfield/part brownfield sites, such as Clive Barracks, Tern Hill, have been identified as proposed allocations.</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy DP18 specifically addresses the re-use of previously developed (brownfield) land and stipulates the circumstances within which such development will be supported.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0455	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Yes	Yes	Yes	Support proposed policies relating to employment and economic growth. Clearly in the context of regional issues with housing delivery and employment delivery, there is an opportunity for Shropshire to capitalise and bring investment into the area. Recognition that proposed Strategic Settlements can assist in delivering economic development, which serves to benefit the economic offer and output of the Plan area, as well as create a level of self-containment to enable these new settlements to thrive sustainably, is supported. Clive Barracks, Tern Hill, will deliver approximately 6ha of employment generating land (as documented in draft Policy SP19). Site promoters remain committed to working with the Council to ensure that the employment opportunities at Clive Barracks are responsive to local need, market demands and the aspirations of the economic growth strategy for Shropshire. Although flexibility over the nature of employment generating uses at the site will be key in ensuring the success of this aspect of the scheme, particularly given the unknown impacts of Brexit/Covid 19, and the fact development is not likely to commence until 2025 and as such employment needs may vary over this time. Work will be undertaken over the coming years to ensure the employment provided is suitable in that economic climate, providing jobs for the new community and beyond.
A0455	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	Yes	Yes	Yes	Support principle of delivering around 300ha of employment land over the proposed Plan period. However, it is essential that flexibility is retained over the nature of the employment generating uses at sites such as Clive Barracks, Tern Hill, particularly in light of potential shifts in employment patterns following COVID-19 and Brexit and to ensure success of the delivery of this aspect of the scheme. Employment opportunities at Clive Barracks, Tern Hill must be able to respond to local need, market demands and changing aspirations of the Economic Growth Strategy for Shropshire. Draft Policy SP13 refers to the need for development of allocated sites, such as Clive Barracks, Tern Hill, to satisfy site-specific guidelines. Concerns in respect of these guidelines are noted in repose to draft Policy SP19.
A0455	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Yes	Yes	Yes	Support identification of the A41 as a strategic corridor. This road provides a vital link in the West Midlands road network. Clear merit in identifying existing important routes, in both the delivery of the Plan and also in identifying future strategies of improvement, such as junction improvements, or where deemed appropriate, road widening. Clive Barracks, Tern Hill, sits either side of the A41. Initial highways evidence collected in support of the site confirms that safe and suitable access to the site can be achieved. Improvements to the A41/A53 roundabout are proposed to improve capacity at this junction.
A0455	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Yes	Yes	Yes	In Para 2a of draft Policy DP1 it is considered that wording should refer to the need for an up to date Local Housing Need Survey, to ensure housing delivery reflects need at that point in time, rather than a snap shot in time, sometime over the 22 year Plan period. In Para 2b of draft Policy DP1 it is considered the proposed split should be the starting point which schemes should have due regard to, not a definitive requirement. Para 2a and 2b should also recognise that the mix of the remaining open market housing provision should have regard to housing market demand and individual site viability. Delivery of open market housing should reflect individual site character, design and accessibility as well as current market demand. Overly prescriptive requirements could compromise the viability of allocated sites. Suitability of the proposed housing mix should also have regard to the commitment to support unmet needs arising in the Black Country and whether the mix will meet these needs. Discussions should be had with neighbouring authorities to establish what their housing need composition looks like, and this should be reflected in Shropshire housing mix policies.
A0455	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Yes	Yes	Yes	In relation to the 10% on-site self-build/custom-build proposals within Draft Policy DP2, the flexibility from the use of the word "encouraged" rather than "required" or "expected" is supported. Consider that on some sites, such as Clive Barracks, Tern Hill, this level of provision would be inappropriate. It should be recognised that in respect of large-scale developments, it is often very difficult to accommodate such plots without having a negative impact on viability. In the case of Clive Barracks, it is not clear whether the implications of such a requirement have been fully assessed by the Council. Promoter of Clive Barracks, Tern Hill, do not rule out providing self-build/custom-build plots, however this must be seen as part of the proposals for the whole site, including all aspects such as planning obligations, abnormal costs of development and the overall character and design of the scheme. Key practical considerations for self-build/custom-build plots are: purchasers tend to want to be in remote / private settings, difficult to accommodate on large strategic sites; sales rate for such plots tends to be very slow due to the restricted nature of the market; mainstream developers tend to take a very risk-averse attitude to such plots offering low values for them; on a large strategic sites with high levels of infrastructure investment, accommodating self-build plots in a remote part of the development is very difficult without incurring high initial infrastructure costs – which is anticipated to make the sales of plots, at best, cost neutral. Concerned about use of the self-build register as the basis for need, as registry is not means tested and people can be on multiple registers meaning need could be over-estimated. Any attempt to alter the draft Policy to make such provision a requirement would be considered unsound for the above reasons.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0455	B003	N/A	Noted.	No
A0455	B004	N/A	Shropshire Council considers that Policy SP13 and the employment development strategy for Shropshire is appropriate, effective, sustainable and deliverable. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local Plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic.	No
A0455	B005	N/A	Shropshire Council welcomes the support for Policy SP14 as part of the employment development strategy for Shropshire which is considered to be appropriate, effective, sustainable and deliverable.	No
A0455	B006	Amend para 2a of draft Policy DP1 to reference up to date Local Housing Need Survey. Amend para 2b of draft Policy DP1 so that the proposed split is the starting point and not a definitive requirement. Amend para 2a/2b of draft Policy DP1 to include reference to the mix of the remaining open market housing provision having regard to housing market demand and individual site viability. Ensure proposed housing mix responds to unmet needs arising in the Black Country that are to be met in Shropshire.	Noted. It is considered that para's 2a/b of draft Policy DP1 provide an appropriate balance between ensuring that new development will include an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) about housing mix requirements, and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand. Specifically with regard to para 2a, it references the need for a Local Housing Need Survey to be undertaken within the last 5 years (reflecting the review cycle for the 'Right Home Right Place' Local Housing Need Survey) and as such ensures that the evidence informing the housing mix on a site is up to date.	No
A0455	B007	Recognise that in respect of large-scale developments, it is often very difficult to accommodate such plots without having a negative impact on viability. Query use of self-build register to establish need.	Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. It is considered that the proposed approach within draft Policy DP2, alongside other relevant policies relating to residential development in the draft Shropshire Local Plan, will effectively meet the diverse need for self-build and custom-build development. It is also considered that the proposed approach with draft Policy DP2 provides appropriate flexibility regarding provision of self-build and custom-build plots on large development sites. The Self-Build Register is considered a robust source of information for determining self-build housing need and is referenced as such within National Planning Practice Guidance (NPPG).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0455	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Yes	Yes	Yes	<p>Clive Barracks, Tern Hill lies in the lower north affordable housing zone, this level is welcomed in comparison to the higher south affordable housing zone. However, there appears to be a disconnect between these levels and the Shropshire Dynamic Viability Index 2013 (SDVI) which suggests rates between 0% and 5%.</p> <p>The Shropshire Viability Study notes "very little development is shown as viable, even without affordable housing" in the north but that from "'on the ground' experience there is a strong case to have a minimum requirement of 10% affordable housing." It is considered that on the ground evidence is limited, sites identified in the Shropshire Viability Study are far smaller, date from 2015-2017 with historic planning obligations, and are not comparable with those proposed within the draft Shropshire Local Plan. The few examples provided cannot form a reliable body of evidence on which to base a policy for a blanket 10% affordable contribution in the north. Therefore the 10% rates should be revisited. Recognise part 2 of draft Policy DP3 provides for reduced rates of affordable housing if exceptional circumstances are evidenced. However, if the 10% affordable provision is progressed in the northern zone, evidence suggests all sites in the north of the Authority will have to go through the process of evidencing exceptional circumstances to reduce the affordable housing provision. This is not considered a suitable or appropriate methodology, and will have implications for housing delivery, particularly in the early years of the Plan. Furthermore, it is misleading to members of the public and Councillors who will expect the delivery of 10% affordable housing, but on most occasions will not see this delivered.</p> <p>Strategic Brownfield Sites, such as Clive Barracks are viable and deliverable, but they have more significant site clearance and remediation costs, so are viable at lower levels of affordable housing provision than their greenfield counterparts. As such they will automatically fall under part 2 of draft Policy DP3. Sites of this nature require flexibility of approach in respect of viability but some certainty is required. In this case that needs to be that the starting point for affordable housing provision will not be a percentage requirement which is already evidenced as undeliverable.</p> <p>Para 63 of the National Planning Policy Framework (NPPF) states "To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount".</p> <p>Policy wording requires review to better reflect the evidence base and the nature of sites which are to be brought forward within the northern zone. Alternatively, the policy needs to omit strategic sites entirely from the Spatial Zones, and instead for these to be considered separately and not in comparison with small, greenfield schemes.</p>
A0455	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP25	Yes	Yes	Yes	<p>Fully support the need for a development to deliver or fund any critical or statutory infrastructure required as a result of a proposed development. However, Community Infrastructure Levy (CIL) and Section 106 contributions need to be at a level that enables development to take place and does not challenge viability. The Shropshire Viability Study notes "Viability should not compromise the quality of development. But it is important to ensure that the total cumulative cost of relevant policies, local and national standards, design requirements, any site-specific considerations and development contributions are not of a scale that will make development unviable."</p> <p>Part 4 of draft Policy DP25 advises Section 106 contributions will be used to 'top up' any additional infrastructure spend. Regard must be had for whether such an approach remains viable, and will not lead to non-delivery. In addition, strategic sites should not pay for infrastructure through S106 which is not necessitated by their development, in line with the tests in the CIL Regulations.</p> <p>Considered the blanket approach set out within the draft Shropshire Local Plan, with no reference of a CIL review or real flexibility on CIL/Section 106 and other planning obligations, is not appropriate for Strategic Sites which require greater flexibility.</p> <p>With regard to CIL, it is set at a rate which challenges development viability. The Council had previously indicated an intention to review CIL, however there is no such recognition with the draft Shropshire Local Plan. Such a review is recommended by the Shropshire Viability Study. There is real risk of an internally inconsistent Plan and CIL regime, with CIL being non-negotiable and thus viability discussions on the S106 needing to be progressed risking delay to delivery. CIL is outside of the remit of the Local Plan Examination, which means that any changes due to issues of viability will need to come from obligations, such as rates of affordable housing.</p>
A0455	B016	Sustainability Appraisal	Sustainability Appraisal	Yes	Yes	Yes	<p>Concerned regarding the conclusions reached in the sustainability Appraisal (SA) in relation to the Clive Barracks, Tern Hill sites. Specifically the SA allocates a '--' for strongly negative effect as the site contains Ancient Woodland and proximity of Local Wildlife Sites. The effect is described to be: "Likely to have a significant adverse impact on the whole, or on a large part of, Shropshire, on internationally or nationally protected assets or on areas outside the county. The effect is predicted to be direct, permanent, irreversible and of major magnitude". This is not considered a fair assessment.</p> <p>Whilst Ancient Woodland falls within the site, it will be retained. Supporting work undertaken by the site promoter has been used to inform the proposed buffers to the woodland to ensure that it is not impacted by the development (a buffer of a minimum of 30m).</p> <p>Local Wildlife Sites fall outside of the Clive Barracks, Tern Hill site. But again have been considered in full in developing the proposals for the site, with buffers of a minimum of 15m have been taken forward in developing the masterplan.</p> <p>Understand that in respect of Criterion 2 the site is within the prescribed distance to reserve a '--' scoring, consider insufficient justification for the scoring of the site in respect of Criterion 1 to justify the '--' scoring against the prescribed methodology for impacts on Ancient Woodlands as referenced at para 2.73.</p> <p>Development of Clive Barracks, Tern Hill will provide additional woodland planting which will connect the Ancient Woodland with other woodland onsite, providing an enhancement to both of these habitats. An appropriate woodland management regime could also be introduced which would enhance the structural diversity of the woodlands. As such it is considered that the SA scoring relating to Ancient Woodland and Wildlife Sites should be amended from '--' to '0' score denoting a neutral impact.</p> <p>Also concerned regarding scoring of Clive Barracks, Tern Hill in relation to accessibility of open space. The site is marked down in relation to access to a children's playground, outdoor sports facility, amenity green space and accessible natural green space (natural/semi-natural). This does not take into account that all of the above facilities already exist onsite and the proposed development (as demonstrated by the Illustrative Masterplan) will reinstate these amenities, and more. Scoring should therefore be amended to '0'.</p> <p>Accounting for these suggestions, SA scoring would change from -14 (Fair) to -6 (Good), which better reflects its suitability for allocation.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0455	B008	<p>Review 10% affordable housing contributions for development in the north of Shropshire.</p> <p>Review policy wording to better reflect the evidence base and the nature of sites which are to be brought forward within the northern zone. Alternatively, the policy needs to omit strategic sites entirely from the Spatial Zones, and instead for these to be considered separately and not in comparison with small, greenfield schemes.</p>	<p>Noted. Shropshire Council considers that the proposed affordable housing contributions are appropriate. They respond to the significant affordable housing need identified in Shropshire and best available information on development viability, from within the Shropshire Viability Study.</p> <p>With regard to the north of Shropshire, it is important to note that significant levels of development currently occurs and that this development does provide the current affordable housing contributions in this area which is a minimum of 10%.</p> <p>Within the Shropshire Viability Study 'strategic sites' including Clive Barracks, Tern Hill, are separately assessed. The assessment concludes that "these sites have capacity to bear both affordable housing and developer contributions. There is no doubt that the delivery of any large site is challenging so, rather than draw firm conclusions at this stage, it is recommended that that the Council engages with the owners in line with the advice set out in the Harman Guidance". Shropshire Council is committed to positive engagement with these site promoters and draft Policy DP3 provides appropriate flexibility on this matter.</p>	No
A0455	B009	<p>Include a commitment to undertake a CIL Review within a defined time period (suggest 2 years).</p>	<p>New development should only take place where there is sufficient existing infrastructure capacity available or any shortfall in capacity is addressed. Draft Policy DP25 identifies the mechanism by which any developer contributions to infrastructure provision is to be secured, providing certainty to all parties (decision maker, local communities and development industry). The draft Policy provides certainty that 'double counting' will not occur between CIL and S106 obligations and that CIL funds will be prioritised towards meeting any critical or statutory infrastructure requirements resulting from the development. Furthermore, S016 obligations can only be used where they meet the tests defined within the National Planning Policy Framework (NPPF), these tests are directly referenced within the explanation to this draft Policy.</p> <p>The explanation to draft Policy DP25 recognises that CIL rates can only be amended through a CIL Review. However, the Shropshire Viability assessment is predicated on the assumption that CIL continues at current rates. Furthermore it is noted that Government is considering changes to the Developer Contributions process, which needs careful consideration. As such it is not considered either necessary or appropriate to commit to a CIL Review within the draft Shropshire Local Plan.</p>	No
A0455	B016	<p>Amend the Sustainability Appraisal for Clive Barracks, Tern Hill.</p> <p>Criteria 1 should be amended from '-' to '0' for ancient woodland and wildlife site.</p> <p>Criteria 5 should be amended from '-' to '0' for children's playground, outdoor sports facility, amenity green space and accessible natural green space (natural/semi-natural).</p>	<p>NPPF paragraph 175c gives national protection to Ancient Woodland so the Council considers the score for Ancient Woodland on this site be correct. The Council also considers the score for the nearby Wildlife Sites to be correct – the River Tern and R.A.F. Tern Hill Wildlife Sites are adjacent to the site boundary and in the case of R.A.F. Tern Hill partly within the site. Additionally, the Council's Open Space Assessment does not indicate the presence of a children's playground, outdoor sports facility, amenity green space or accessible green space within the site.</p> <p>Developer's proposals to retain or provide facilities can only be considered at the planning application stage when the details of a proposal are known. Such issues cannot be taken into account at the Plan making stage and thus cannot form part of any SA.</p> <p>No change proposed.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0456	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 Whitchurch WHT037 WHT044	No	No	No	Unsound – Both these sites WHT037 and WHT044 were not included in the original Local plan which was not signed off within the original time frame. Therefore why have the areas, which were originally deemed too wet and prone to flooding, now been considered for development. There have been serious sewage issues at The Brambles and The Mount estate off the Tarporley Road. Development should not be allowed to take place when it causes increased run off and flooding of existing properties, as has occurred on Chester Road, as a consequence of Oak Tree Way and The Beeches being built.
A0457	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Ford	No	No	No	Ford should not be a Hub - the Hierarchy of Settlements is flawed. Ford has scored 51 points but the scoring system has been misapplied and the correct number of points is 42. Hub status should also be removed due to Conservation Area, lack of infrastructure, soils, minerals, species, contrary to RHRP findings. Petition against this Hub status. Plan is unsound as consultation responses ignored. Question the summary of the previous consultation. No evidence has been produced that the local housing need will be met. There is no infrastructure plan.
A0457	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	Many communities query as unjustified the scoring mechanism used identify whether a village is nominated as “Hub”. The methodology used has never been scrutinised and is a basic premise of the revised plan. Should this be found to be in error the whole plan may be found to be unsound.
A0457	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP6	Not Specified	Not Specified	Not Specified	Many communities dispute the way the interpretation of the policy has changed since it was first introduced
A0457	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP7	No	No	No	The Reg 19 consultation is the first time that this policy has been subject to consultation on the detailed criteria for where and how cross-subsidy housing can be delivered. This is a procedural flaw and stakeholders should have had prior opportunity to comment on the detail of the policy at earlier stages in the Local Plan preparation process. The Parish Council is concerned that Part a.iii. of the policy states that cross-subsidy housing can be built in “Another settlement {i.e. an unclassified settlement} with a school or the ability to access a school by public transport”. A school alone is not an indication of whether a location is unsustainable. In Ford, the village is not sustainable (see our comments on S16.2) and the school is at capacity. Further development would put excessive pressure on its finite resources.
A0457	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3 and DP11	Not Specified	Not Specified	Not Specified	New policies put forward it is assumed to meet with the Councils decision to declare a Climate Emergency

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0456	B001	Remove WHT037 and WHT044 from the Local Plan	Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0457	B001	Ford should no longer be designated as a community hub in Policy S16.2 and associated maps and supporting text. Ford should instead be Open Countryside	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Ford. Consequently, it is considered appropriate that Ford is identified as a proposed Community Hub and it is further proposed to identify a development guideline, development boundary and a housing allocation on site FRD011 consistent with other rural settlements considered to be appropriate for designation as a Community Hub for policy purposes. Ford has a service points score of 51 points above the threshold of 48 points to be designated as a Community Hub. This service score recognises the accessibility of the village from Shrewsbury by public transport and its broadband connectivity to electronic communications and services. The village also has a good range of local services including a primary school, local shop and petrol filling station, community hall, mobile library service, public house and church with a range of outdoor sports and play spaces. The proposed allocation FRD011 is expected to meet its own infrastructure requirements and to further improve the capacity of services where necessary to improve the infrastructure capacity of the village. It is therefore considered that Ford is appropriately designated as a Community Hub in the draft Shropshire Local Plan along with the allocation of site FRD011 for housing development.	No
A0457	B002	HoS needs to be scrutinised and examined. Garden Villages need to be subject to a Scrutiny Review.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire. This methodology and its subsequent application has been the subject of consultation as part of the Local Plan Review process.	No
A0457	B003	This should and must be scrutinised, so all understand it and there is a communality of approach	Noted. Shropshire Council consider the criteria and requirements identified within draft Policy DP4 are appropriate and set out a clear approach to single plot exception sites. The Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP4 the relevant requirements of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations. A Housing SPD will also support housing policies and provide further guidance and clarity.	No
A0457	B004	Policy DP7 should be subject to further consultation and cross-subsidy housing should not be allowed outside of designated settlements and should be focused in or on the edge of Strategic Key and Principal areas where there is an appropriate range of facilities. Criteria a.ii & iii of the policy should be removed to ensure such development is not allowed in village/rural locations.	Noted. A version of draft Policy DP7 was consulted upon within the Regulation 18: Pre-Submission Draft Consultation. Shropshire Council considers that it is appropriate to allow for cross-subsidy exception sites within/immediately adjoining the built form of a settlement with a school or the ability to access a school by public transport, where such proposals meet the wider requirements of draft Policy DP4, including that there is a proven local affordable housing need and it is served by an adequate access and infrastructure and has reasonable access to local services by walking, cycling or public transport; and the wider draft Policies of the draft Shropshire Local Plan (including draft Policy DP25 regarding infrastructure provision).	No
A0457	B005	Scrutiny should be given the opportunity to examine this. To look at what is proposed and if needed receive assurance that it will deliver the policy it has set.	The draft Local Plan will be discussed at a full Council meeting and following submission, will be subject to an Examination in Public. The Council thus considers the Plan will be adequately scrutinised	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0457	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	No	From the early submissions to the questionnaires on the Local Plan it became absolutely clear that individual respondents were emphatically opposed (88% against) to the high level of growth being proposed by Shropshire Council. This attitude was also backed by both town and parish councils (74% against) who were also opposed to such high growth levels. These strongly held views of the wider public are being ignored by the Cabinet members (no doubt backed by central government policy) who are undemocratically pursuing their own agenda. For Shropshire Council to totally ignore the overwhelming view of its electorate and their local government representatives is unsound. A high degree of arrogance has been shown by Shropshire Council with their lack of a response at all the consultation phases when perfectly legitimate concerns and/or questions were raised – all the meetings and consultations were simply a box ticking exercise.
A0458	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Bridgnorth BRD030	Not Specified	Not Specified	Not Specified	n/a
A0458	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and S3. Bridgnorth (BRD030)	Not Specified	Not Specified	No	The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers ‘.. will make provision for the needs of the town and surrounding hinterland...’? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0457	B006	Please refer to attached sheets – endorsement of comments of Shropshire Councillor Roger Evans	<p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Each stage of consultation has been supported by a proportionate evidence base. Following each of these stages of consultation, a summary of the responses received has been prepared and form appendices to the Consultation Statement prepared for the 'Regulation 19' Pre Submission Draft of the Shropshire Local Plan.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>Where following consultation it has been proposed to make amendments to proposals in response to the consultation process or indeed any other emerging evidence, this has been documented within relevant subsequent consultation documents (reflecting the iterative process undertaken during the <u>Regulation 18 Plan Preparation stage</u>).</p>	No
A0458	B001	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No
A0458	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0458	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Bridgnorth BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.
A0458	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?
A0458	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not compatible with one another re poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.
A0458	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0458	B003	The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.	Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers. Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."	No
A0458	B004	What areas / units are already available for occupation and how long have they been vacant? What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19. If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?	Noted. Shropshire Council has undertaken an Economic Development Needs Assessment and Employment Land Review to inform the Local Plan Review. The Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Specifically with regard to employment land, this proposed strategy provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Having a supply of land which creates choice and competition in the market provides flexibility to respond to changing circumstances. Employment allocations are specifically allocated for employment purposes. Draft Policy SP13 indicates that allocated employment land will be protected for employment generating uses and alternative uses will only be supported in specific circumstances, as documented within the draft Policy.	No
A0458	B005	Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing. Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences. Provide details of how noise and odour can be mitigated in these circumstances.	Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection. Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity. Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market. Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.	No
A0458	B006	What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur. Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458. Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0458	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0458	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 and S3 (BRD030)	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0459	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	HoS is flawed and unsound as it ignores the requirement for a Hub to have both significant employment and peak-time public transport (Trefonen has neither); it therefore goes against the Council's Climate Change Policy. The suggestion that other services and facilities may compensate for this flawed alteration is vague and undefined, relying on subjective opinion rather than objective comparison of settlements. The Threshold score of 48 points for Hub status has been set using inaccurate scoring in both the 2017 Table 10 and the 2020 Table 10. It is therefore neither appropriate nor robust, thus rendering the Hierarchy of Settlements 'unsound'. Since Policy SP2 Para 6 and SP2.2. Community Hubs relies on this Hierarchy of Settlements as its evidence base, it must also be deemed 'unsound'.
A0460	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3	Not Specified	No	Not Specified	The late emergence of the Tasley Garden Village proposal was limited to online consultation only due to the Covid 19 pandemic with no option for the public to examine the plans in person or discuss them at exhibitions and meetings. A substantial number of objections to the Bridgnorth Place Plan were made to Shropshire Council through the Regulation 18 consultation including objections from the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils. Despite this, it would appear that no account has been taken of these views and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils was formed in June 2019 to consider the issues facing Bridgnorth and to develop a plan for the settlement. Their draft report was published in May 2020, around the same time that the Tasley Garden Village proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0458	B007	Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030. Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision. Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators." Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.	No
A0458	B008	Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional. Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat. Explain the measures to be taken to improve air quality in Bridgnorth. Explain how noise and odour will be mitigated. Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal. Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology. Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.	No
A0459	B001	The HoS needs to be amended to comply with SP1 and SP3 and Sustainability Objectives SO5, SO6 and SO12, which seek to reduce carbon emissions by using sustainable travel rather than private car transport. I am also very concerned about Trefonen's rising water table and further proposals to build on flood plains. The relaxation of criteria for Hub Status must be overturned and the full Hub Criteria as set out in Para 1.6 Table 2 and Para 5.35 Table 6 must be applied as an objective assessment. The requirements to have both 'significant employment opportunities' and 'peak time public transport' for Hub Status must be met. We have neither and very little else to compensate. In turn, the list settlements must be reviewed to confirm full compliance; and the Draft Plan for settlement development status must be amended accordingly. Trefonen must be removed from Community Hub Status and classified as a Rural Settlement.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment. As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.	No
A0460	B001	Provide an explanation as to why the views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored. Delay any decision on the Legal Compliance and Soundness of the Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.	Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0460	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0460	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?
A0460	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Bridgnorth BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.
A0460	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.
A0460	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 and S3 (BRD030)	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0460	B002	Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030. Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision. Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators." Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.	No
A0460	B003	What areas / units are already available for occupation and how long have they been vacant? What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19. If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?	Noted. Shropshire Council has undertaken an Economic Development Needs Assessment and Employment Land Review to inform the Local Plan Review. The Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Specifically with regard to employment land, this proposed strategy provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Having a supply of land which creates choice and competition in the market provides flexibility to respond to changing circumstances. Employment allocations are specifically allocated for employment purposes. Draft Policy SP13 indicates that allocated employment land will be protected for employment generating uses and alternative uses will only be supported in specific circumstances, as documented within the draft Policy.	No
A0460	B004	The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.	Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers. Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."	No
A0460	B005	What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur. Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458. Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.	No
A0460	B006	Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional. Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat. Explain the measures to be taken to improve air quality in Bridgnorth. Explain how noise and odour will be mitigated. Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal. Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology. Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0460	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site.</p> <p>Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not compatible with one another re poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18.</p> <p>It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated?</p> <p>BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.</p>
A0460	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and S3. Bridgnorth (BRD030)	Not Specified	Not Specified	No	<p>The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030).</p> <p>At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers ‘.. will make provision for the needs of the town and surrounding hinterland...’?</p> <p>In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?</p>
A0461	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	Support this policy, however there is some imbalance to Market Drayton.
A0461	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3 and DP11	Not Specified	Not Specified	Not Specified	Whilst recognising that responding to climate change will be an issue of increasing importance during the plan period it is currently unclear how a number of the requirements of these policies will be applied. It is also unclear whether the viability implications of these requirements have been tested.
A0461	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	Not Specified	Not Specified	Not Specified	Support this policy

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0460	B007	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0460	B008	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0461	B001	Policy could and should accommodate further residential development of a level that supports the proposed economic growth of the town.	Noted. Shropshire Council considers that the proposed development strategy for Market Drayton and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0461	B002	n/a	Comments noted	No
A0461	B003	n/a	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0461	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Not Specified	Not Specified	Not Specified	Support the use of policies group by area, referred to as 'Place Plan Areas'. This approach allows local character, need and contexts to be accounted for within the Strategic Planning process. However, object to the strict controlling of additional market housing as set in response to Policy SP9.
A0461	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	Not Specified	Not Specified	Not Specified	Gladman object to the use of settlement boundaries in circumstances such as this where they preclude otherwise sustainable development from coming forward. This conflicts with the objectives of the Framework to significantly boost to boosting the supply of housing.
A0461	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	Not Specified	Not Specified	Support the general approach of the policy, particularly section 2 which allows flexibility within the mix and variety of dwellings sizes for market dwellings.
A0461	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Not Specified	Not Specified	Not Specified	General support for this policy. However, there is no reference to the figures in DP2 within the SHMA. The conclusions on the viability for self-build plots is not clear in the assessment as no further reference to such housing types is given within the rest of the study or indeed, the findings. In addition, without the SHMA analysing the need for self-build plots it is unclear why viability has been tested against a 10% requirement for self-build plots.
A0461	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	Not Specified	Not Specified	Support for this policy
A0461	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1 Market Drayton	Not Specified	Not Specified	Not Specified	The overall strategy for Market Drayton can be summarised as delivering growth that supports the aims and objectives of the previously draft neighbourhood plan. Many of the allocations can be found in this draft document. Yet, the Council appear non-committal to this strategy which has resulted in the lack of certainty outlined in in Paragraph 3 of S11.1. Gladman suggest this, in part, comes from not allocating the existing sports facilities at Greenfields Sports Facilities for redevelopment. Gladman suggest that Market Drayton as a principal centre can and should support more than 1,200 dwellings over the course of the plan period
A0461	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1 MDR039	Not Specified	Not Specified	Not Specified	Support this site.
A0461	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1 MDR043	Not Specified	Not Specified	Not Specified	The area and shape does not seem to lend itself to a well-conceived and high-quality form of development.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0461	B004	n/a	<p>Noted. The purpose of the draft Shropshire Local Plan is to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations.</p> <p>However, draft Policy SP7 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such, draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.</p> <p>As such, Shropshire Council considers that draft Policy SP7 is justified, effective and consistent with national policy. It is also considered that draft Policy DP1 is complementary in that it ensures the effective use of land and that the forms of housing delivered are responsive to the needs of local communities.</p>	No
A0461	B005	<p>Suggest that further flexibility should be provided for within Policy SP9 to consider sustainable development opportunities beyond the development limits identified on the Policy Maps.</p> <p>Due to the rural nature of the County, Gladman suggest that a blanket approach to development beyond the settlement boundary may not be appropriate nor effective. A criterion-based approach that considers additional residential schemes that adjoin the settlement boundaries of the Strategic Centre of Shrewsbury and the Principal Centres may be a more appropriate approach.</p>	<p>Noted. The purpose of the draft Shropshire Local Plan is to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying development boundaries and residential development guidelines for settlements. Accordingly, a wide range of allocations and other opportunities are provided by the Draft Plan for all types of housing within settlements. SP10 reflects the Draft Plan strategy of achieving a sustainable and appropriate pattern of development through new development focused in the urban areas. In line with the Plan's strategy SP10 seeks to strictly control new market housing outside development boundaries.</p>	No
A0461	B006	<p>Suggest further clarity is required to justify the inclusion of the WMS (2015) requirements, notably those included in Paragraph 5 of Policy DP1. Although it appears the impact of applying such standards has been assessed within the Viability Study, it is difficult to ascertain the conclusions of the study and therefore how the policy requirements have been derived.</p> <p>A blanket policy approach relating to optional standard and specifically wheelchair accessible properties may not be appropriate across the whole plan area and therefore the requirements may need to vary across locations, sites and schemes.</p>	<p>With regard to M4(2) and M4(3) housing, the Strategic Housing Market Assessment (SHMA) identifies that growth in the number of older persons' households is a key feature in the population and household change projected to occur in Shropshire over the Local Plan period from 2016 to 2038. It calculates a total need for M4(2) and M4(3) housing equivalent to 77% of total household growth (of which M4(3) constitutes around 13%). It is recognised that part of this need can be met within specialist accommodation, however Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible. As such Shropshire Council considers the SHMA justifies the proposed thresholds for M4(2) and M4(3) standard dwellings. It is also considered appropriate to provide the explanation of the distinction between wheelchair accessible and wheelchair adaptable housing within the proposed explanation rather than the draft policy.</p>	No
A0461	B007	<p>Do not oppose such a policy but highlight that further evidence should be made available within the SHMA to justify the inclusion of Policy DP2. Recommend any policy specific requirement to include a mechanism whereby if the self-build plots are not taken up within a given time period, then these revert back to market housing to be provided as part of the wider scheme.</p>	<p>As documented within the proposed explanation to draft Policy DP2, the SHMA concludes that over the proposed Plan period, around 2,400 applications will be made for inclusion on the Self-Build Register. Although not directly comparable, this equates to around 9% of the calculated local housing need. As such it is considered appropriate to encourage larger development sites to make 10% of dwellings available for Self-Build developers, where there is an identified need on the Self-Build Register.</p> <p>Draft Policy DP2 includes a 24 month marketing timescale, which is considered appropriate.</p>	No
A0461	B008	n/a	Noted	No
A0461	B009	<p>To support the relocation of the sports fields it is important that the current location is released for residential development through an allocation with the expectations and requirements of this site being released for residential development being set out through policy wording. Gladman is confident that the relocation of the existing Greenfields Sports Facilities to the new preferred site is a realisable option as the landowners are willing to make this land available for the relocated sports facilities. Further strategic housing growth should be allocated to Market Drayton.</p>	<p>Noted, Shropshire Council considers that the strategic approach for Market Drayton is appropriate.</p>	No
A0461	B010	n/a	Noted.	No
A0461	B011	<p>Gladman respectfully suggest that further work should be undertaken to define an area that makes more efficient use of the land.</p>	<p>Shropshire Council considers that the proposed development strategy for Market Drayton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0461	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1 Alternative sites	Not Specified	Not Specified	Not Specified	The housing guideline for Market Drayton should be higher.
A0462	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0461	B012	MDR042 should also be an allocation	Shropshire Council have undertaken a robust assessment of all of the promoted sites and consider the approach taken to the preferred allocations as being reasonable and appropriate for the Local Plan. The preferred allocations are all considered as being suitable, available and achievable (including viable).	No
A0462	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0463	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0464	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0463	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0464	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0465	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 WHT037 & WHT044	Yes	No	Yes	These sites will cause over-development of the area. The sites have flood issues. Habitats on site.
A0466	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.4 HWD005	Yes	Not Specified	Not Specified	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside.
A0466	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.4 HWD004	Yes	Not Specified	Not Specified	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside.
A0466	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.4 HWD003	Yes	Not Specified	Not Specified	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside.
A0466	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.4 HWD001X	Yes	Not Specified	Not Specified	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Very small site
A0466	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.4 HWB006	Yes	Not Specified	Not Specified	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside. North Side of village wrong area for any further development. Important to maintain the green wedge between existing developments. Rurality of area would be lost. Large Development (1500 houses) being recommended on a nearby site off the A5
A0466	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.4 HWD002	Yes	Not Specified	Not Specified	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access via an unadopted road which is not suitable for more vehicular traffic. Access of the unadopted road onto the main highway unsafe.
A0466	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.4 HWB001X	Yes	Not Specified	Not Specified	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside. North Side of village wrong area for any further development. Important to maintain the green wedge between existing developments. Rurality of area would be lost. Large Development (1500 houses) being recommended on a nearby site off the A5
A0466	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.4 HWB004	Yes	Not Specified	Not Specified	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside. North Side of village wrong area for any further development. Important to maintain the green wedge between existing developments. Rurality of area would be lost. Large Development (1500 houses) being recommended on a nearby site off the A5

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0465	B001	Development could be restricted to the northern strip of land, parallel to the bypass, between Tarporley Road and Chester Road roundabouts.	Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0466	B001	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside.	Noted. Shropshire Council considers that the proposed development strategy for Hanwood and the existing commitments (including the existing allocation) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. It has also been informed by a proportionate and robust site assessment process has been undertaken, including consideration of this promoted site as part of a wider site promotion.	No
A0466	B002	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside.	Noted. Shropshire Council considers that the proposed development strategy for Hanwood and the existing commitments (including the existing allocation) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. It has also been informed by a proportionate and robust site assessment process has been undertaken, including consideration of this promoted site as part of a wider site promotion.	No
A0466	B003	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside.	Noted. Shropshire Council considers that the proposed development strategy for Hanwood and the existing commitments (including the existing allocation) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. It has also been informed by a proportionate and robust site assessment process has been undertaken, including consideration of this promoted site as part of a wider site promotion.	No
A0466	B004	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Very small site	Noted. Shropshire Council considers that the proposed development strategy for Hanwood and the existing commitments (including the existing allocation) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. It has also been informed by a proportionate and robust site assessment process has been undertaken, including consideration of this promoted site as part of a wider site promotion.	No
A0466	B005	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside. North Side of village wrong area for any further development. Important to maintain the green wedge between existing developments. Rurality of area would be lost. Large Development (1500 houses) being recommended on a nearby site off the A5	Noted. Shropshire Council considers that the proposed development strategy for Hanwood and the existing commitments (including the existing allocation) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. It has also been informed by a proportionate and robust site assessment process has been undertaken, including consideration of this promoted site as part of a wider site promotion.	No
A0466	B006	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access via an unadopted road which is not suitable for more vehicular traffic. Access of the unadopted road onto the main highway unsafe.	Noted. Shropshire Council considers that the proposed development strategy for Hanwood and the existing commitments (including the existing allocation) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. It has also been informed by a proportionate and robust site assessment process has been undertaken, including consideration of this promoted site as part of a wider site promotion.	No
A0466	B007	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside. North Side of village wrong area for any further development. Important to maintain the green wedge between existing developments. Rurality of area would be lost. Large Development (1500 houses) being recommended on a nearby site off the A5	Noted.	No
A0466	B008	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside. North Side of village wrong area for any further development. Important to maintain the green wedge between existing developments. Rurality of area would be lost. Large Development (1500 houses) being recommended on a nearby site off the A5	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0466	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.4 HWB003	Yes	Not Specified	Not Specified	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside. North Side of village wrong area for any further development. Important to maintain the green wedge between existing developments. Rurality of area would be lost. Large Development (1500 houses) being recommended on a nearby site off the A5
A0466	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Not specified	Not Specified	Not Specified	Not Specified	Blank Form
A0467	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	Yes	Yes	Yes	The parish council supports the fact that only Nesscliffe will be a hub and that the rest of the parish will no longer include community clusters and we support these former clusters now being Open Countryside.
A0467	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2	Yes	Yes	Yes	The parish council supports the Nesscliffe policy
A0467	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 NES012	Not Specified	Not Specified	Not Specified	The parish council supports the Nesscliffe policy
A0468	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	not specified	Not Specified	Not Specified	Not Specified	The preferred allocation floods, and last did so in 2014 but also the flooding is every year along the east aspect of the field along the weirbrook... this field is lower than the brook which is buffered... i feel drainage will be compromised and sewage treatment is already over subscribed in the reedbed plant north end of church lane.
A0469	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.1	No	Not Specified	Not Specified	The LPR totally ignores the provisions of the current Much Wenlock Neighbourhood Plan. The single commercially driven site is completely out of scale (MUW012VAR). The attempted justification is that the County Council can impose this because the Neighbourhood Plan only runs to 2026. The submission made by the Much Wenlock Neighbourhood Plan Refresh Group to this and the Draft Regulation 18 of the LPR shows that there are highly qualified people in Much Wenlock perfectly prepared to update the Neighbourhood Plan to 2038. A further inconsistency is that other Neighbourhood Plans e.g. Broseley (8.4), which have yet to be officially made are incorporated. Even though they have as yet to identify their Sites. The Council has legal duties to look at the risk of flooding and chose sites least likely to flood. especially as Much Wenlock is officially a Rapid Response Flood Catchment Area. The Site MUW012 VAR has flooded twice this year. Unlike any other Site assessed. Comment on the choice of Site has been put under the 'Sustainability Appraisal of the Regulation 19: Pre-submission Draft of the LPR a required.
A0469	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.1	Not Specified	No	Not Specified	Shropshire Council's Statement of Community Involvement says that there should be meaningful opportunities for the public to engage in looking at the possible options for development in the town and help shape the policy. Council officers have declined invitations to community meetings and ignored the community views that have been submitted. More particularly the original preferred Site MUW012 was reached with no other option being put to the town. Despite objection to the former it then arbitrarily morphed into the much larger MuW012VAR to suit the claimed needs of the landowner and developer. Shropshire Council has said that any dissenting views can be aired at the Examination in Public. The Site Assessments for Much Wenlock (See separate response to the Sustainability Appraisal) are flawed. It has ignored the sequential test that Councils should choose sites that are not at risk from flooding. It has chosen one that requires serious flood attenuation. It has said that a scheme to attenuate surface water flooding will be required apparently ignoring the probably more serious threat from ground water. There is an artesian well and springs in the field to the East of the MuW012 VAR site. The Council has not considered the strategic impact on the medieval streets and congested main road 'unction A458/A4169 of this and other major local developments or the general flood management in the town

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0466	B009	No more housing needed for this area. Overdevelopment in recent years. Access restricted. Access onto the main highway not good. Area separated from Hanwood by area of open countryside. North Side of village wrong area for any further development. Important to maintain the green wedge between existing developments. Rurality of area would be lost. Large Development (1500 houses) being recommended on a nearby site off the A5	Noted.	No
A0466	B010	Blank Form	Blank Form	No
A0467	B001	N/A	Noted. No soundness issues with draft Policy SP10 are raised. Comments support the change of status of existing Community Cluster settlements to countryside.	No
A0467	B002	query an apparent inconsistency in the document – on p322 of the main document part of Site Ness012 is identified as being allocated but the sustainability appraisal states the site should remain as countryside. It is very hard to check this accurately from the map as Site 0012 is not labelled. This inconsistency needs to be reviewed consistent with the sustainability appraisal.	Shropshire Council welcomes the support for Policy S16.2 in the draft Shropshire Local Plan setting out the settlement strategy for Nesscliffe and recognising the significance of the proposed housing allocations to the role of the village and the opportunity to secure new housing within this community and also recognising the contribution this will make to the growth of Shropshire. It should be noted that site NESS012 is not included within the proposed development boundary for Nesscliffe.	No
A0467	B003	query an apparent inconsistency in the document – on p322 of the main document part of Site Ness012 is identified as being allocated but the sustainability appraisal states the site should remain as countryside. It is very hard to check this accurately from the map as Site 0012 is not labelled. This inconsistency needs to be reviewed and be consistent with the sustainability appraisal.	Shropshire Council welcomes the support for Policy S16.2 in the draft Shropshire Local Plan setting out the settlement strategy for Nesscliffe and recognising the significance of the proposed housing allocations to the role of the village and the opportunity to secure new housing within this community and also recognising the contribution this will make to the growth of Shropshire.	No
A0468	B001	n/a	As specified in the site guidelines: "The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, development will also be excluded from the elements of the site located in Flood Zones 2 and/or 3, these areas will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere."	No
A0469	B001	Comply with Government legislation and Planning Policies. Comply with the policies of the Much Wenlock Neighbourhood Plan updating it as necessary. Re-evaluate all the Sites using accurate information - see submission under Sustainability Appraisal. The Much Wenlock Civic Society does not disagree with the right of the County Council to set the number of homes to be built in Much Wenlock to 2038 but any change in the annual rate of completions should be subject to extensive consultations with the local community. It believes that the present target can be met observing the policies of the Neighbourhood Plan. it merely asks that the County Council does not ignore the status and policies of the Neighbourhood Plan without justification and explanation. in doing so up until now it has ignored the requirements of Acts of Parliament, national policy and guidance and the written views of Government Ministers.	The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides an appropriate development strategy for the settlement.	No
A0469	B002	Comply with Government legislation and Planning Policies. The potential development sites in the town should be accurately reassessed particularly in relation to the provisions of the Much Wenlock Neighbourhood Plan and in respect of Much Wenlock being situated in a Rapid Response Flood Catchment Area. Shropshire Council should say how it is going to deliver the necessary infrastructure to support a 15% growth in the town. The related issues of the impact on the town of building 1000 plus homes at Buildwas in which is also in the Much Wenlock Place Plan Area as well as a similarly sized development in Bridgnorth should be taken into account.	The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides an appropriate development strategy for the settlement.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0469	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	The large scale of overall housing development proposed without clear indications of how this is justified. The Government's assessment of Local Housing Need (paras.3.5, 3.6 and 3.7) is 25,894 homes from 2020 to 2034. Shropshire Council has agreed to co-operate with the Black Country to pick up 1500 homes from their requirement subtotal 26,394 and then says but we might need a few more and makes the total 30,800 homes. There is no clear indication about how they reached this final figure. No indication of how they are going to provide the necessary infrastructure. A popular commuter route to the Black Country from Shrewsbury and vice versa is using the A458 through Much Wenlock (3.13) and then through Bridgnorth. This is in addition to a failure to say how they are going to mitigate the effect on Much Wenlock of Building 1000 houses at Buildwas on the A4169 in the Much Wenlock Place Plan Area. The two roads meet at an already heavily used junction at the Gaskell Arms which leads to rat-running through the towns medieval streets.
A0469	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S20	Not Specified	No	Not Specified	The former Ironbridge Power Station has been designated a Strategic Settlement in the Much Wenlock Place Plan Area (8.13). 8.20 is a proposed development of more than 1000 homes on the A4169 at Buildwas. There is no mention of what would be the impact of this development on Much Wenlock and the rest of the Place Plan area. The A4169 meets the A458 at the Gaskell Junction in Much Wenlock. Congestion already causes queues and rat-running through the narrow medieval streets of a town whose economy is heavily dependent on tourism. Although the impact on traffic is the most obvious effect to be considered the development will also have a considerable impact on a variety of local services in Much Wenlock such as the workload of the medical centre and secondary school places where capacity is already limited. The absence of any consideration of these effects on Much Wenlock must be regarded as a serious defect in the soundness of the draft plan.
A0469	B005	Sustainability Appraisal	Sustainability Appraisal Appendix N	Not Specified	No	Not Specified	The Much Wenlock Civic Society questions the soundness of the Site Assessments and the conclusions drawn from them. For instance Site MuW008 (page 23) This describes the site as having Planning Permission for an attenuation pond after which its suitability may be reassessed. The attenuation pond is one of two costing well over a million pounds and which was built before the LPR process was started. Site MuW012VAR the preferred Site (page 62) The inaccurate assessment includes amongst other inaccuracies 'The percentage of the site within 20m of an historic flood event 0%'. There are photographs over time including 2020 and 2021 showing part of the Site itself flooded.
A0470	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	No	Not Specified	The Shropshire Local Plan is both not legally compliant and is unsound because it entirely disregards the Much Wenlock Neighbourhood Plan as regards the location and size of developments and building of additional housing. There is no problem over the number of additional homes to be provided within the town but the total disregard of the way in which such houses are to be provided has been ignored, rendering the Plan not legally compliant and unsound.
A0470	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	No	Not Specified	The selection of MUW012 has been carried out in a negligent way making it unsound. It floods but the SA states that 0% of the site lies within 20m of a historic flood event. MUW008 should have been selected instead. There has been misinformation around MUW012 and this was enlarged on commercial ground from the developer without local consultation
A0471	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	Not Specified	Not Specified	It is claimed that sites and development numbers for Much Wenlock can be set because the Neighbourhood Plan only lasts until 2026 but the Local Plan is until 2038. The TC have said that they do not need to update the Neighbourhood Plan, if it does not need updating then why have SC decided to impose development and a single site option totally out of step with the provisions of the current Neighbourhood Plan? As evidence by the submission made by the Much Wenlock Neighbourhood Plan Refresh Group there are suitably qualified and experienced local residents ready and willing to find the evidence required to update it. Further SC are willing to accept that the proposed Broseley Neighbourhood Plan should find appropriate as yet unidentified sites for a Neighbourhood Plan which has as yet to be legally finalised. In the Introduction to this draft (page 10), paras 2.29 and 2.30 SC claims it has a positive and proactive approach to Neighbourhood Plans. If so why did it fail to have the MW Neighbourhood Plan and the Shifnal Neighbourhood Plan updated instead of SC taking control and putting its own options to cover the extra 12 years?
A0471	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S20	Not Specified	No	Not Specified	The former Ironbridge Power Station has been designated a Strategic Settlement in the Much Wenlock Place Plan Area (8.13). 8.20 is a proposed development of more than 1000 homes on the A4169 at Buildwas. There is no mention of what would be the impact of this development on Much Wenlock and the rest of the Place Plan area. The A4169 meets the A458 at the Gaskell Junction in Much Wenlock. Congestion already causes queues and rat-running through the narrow medieval streets of a town whose economy is heavily dependent on tourism. Although the impact on traffic is the most obvious effect to be considered the development will also have a considerable impact on a variety of local services in Much Wenlock such as the workload of the medical centre and secondary school places where capacity is already limited. The absence of any consideration of these effects on Much Wenlock must be regarded as a serious defect in the soundness of the draft plan. There are even plans under discussion to make the A458 part of a western development corridor.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0469	B003	Comply with Government legislation and Planning Policies. Give a detailed explanation of how they reached a total of 30,800 homes. What are the commitments/proposals for local employment opportunities? How will they solve the problems caused by the increase in traffic? Particularly through the A4169/A5481 junction in Much Wenlock.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>The proposed employment land supply is documented within Appendix 6 of the draft Shropshire Local Plan.</p> <p>Draft Policy DP25 addresses provision of infrastructure. It states "New development should only take place where there is sufficient existing infrastructure capacity available. Where a new development would lead to a shortfall in infrastructure provision, the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means."</p>	No
A0469	B004	Comply with Government legislation and Planning Policies. The policy for the development of the former Ironbridge Power Station Site for 1000 plus homes needs to take into account what the impact will be on the rest of the Much Wenlock Place Plan Area in particular the A458/A4169 junction.	The draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 addresses infrastructure provision to support development.	No
A0469	B005	Comply with Government Legislation and Planning Policies. Re-assess the possible Sites in Much Wenlock accurately. Use the provisions of the Much Wenlock Neighbourhood Plan, preferably suitably updated to evaluate them and identify suitable Sites.	The Council considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.	No
A0470	B001	Follow the contents of the Much Wenlock Neighbourhood Plan	The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides an appropriate development strategy for the settlement.	No
A0470	B002	The policy in the Plan should reflect a correct and not a seriously negligent appraisal of the sites within the town. This undoubtedly will conclude that MUW012 is unsuitable and that some part of MUW008 should be selected as the preferred.	The proposed site allocations in Much Wenlock have been informed by a proportionate and robust site assessment process which has taken flood risk into account.	No
A0471	B001	Either Much Wenlock's Neighbourhood Plan does not need updating, then the county sets the development target and the terms of the Neighbourhood Plan are used to identify suitable sites, or to keep it relevant the Neighbourhood Plans needs updating in parallel with the LPR. Shropshire Council cannot have it both ways.	The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides an appropriate development strategy for the settlement.	No
A0471	B002	The policy for the development of the former Ironbridge Power Station site for 100+ homes needs to take into account what the impact will be on the rest of the Much Wenlock Place Plan Area in particular the A458/A4169 Junction. Current suggested plans for the junction by the developer that only accounted for three roads have been demonstrated by a professional with a life time experience in major traffic management to fail. Advice is also that a suitable alternative is unlikely to be found for this five-way junction. The council should be asked to consider whether a bypass is a suitable alternative.	<p>Shropshire Council considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways.</p> <p>Proposed site guidelines for the proposed Former Ironbridge Power Station Strategic Settlement include a requirement to undertaken "any necessary improvements to the local and strategic road network...", informed by an appropriate Transport Assessment at the Planning Application stage (site is currently subject to a Planning Application and it is understood a Transport Assessment has been undertaken in support of this application).</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 addresses infrastructure provision to support development.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0471	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Sustainability Appraisal Appendix N	Not Specified	No	Not Specified	SA is inaccurate. MUW008 (page 23) This describes the site as having Planning Permission for an attenuation pond after which its suitability may be reassessed. The attenuation pond is one of two costing well over a million pounds and which was built before the LPR process was started. Site MuW012VAR the preferred Site (page 62) The inaccurate assessment includes amongst other inaccuracies 'The percentage of the site within 20m of an historic flood event 0%'. There are photographs over time including 2020 and 2021 showing part of the Site itself flooded." SC has chosen the site most prone to flooding.
A0472	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 HDL006	Yes	Yes	Yes	I fully support Hadnall PC's endorsement of HDL006 as the preferred site and the Hub status. I believe that the consultation with the PC has been sufficient and they have been afforded the opportunity to respond to the pre-submission draft but chose instead to respond individually to represent their own personal interests.
A0473	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Hadnall	Yes	No	No	Plans presented in the Pre-submission Regulation 18 and subsequent Pre-submission Regulation 19 Drafts of the Shropshire Local Plan provide no such protection and leaves unnecessary ambiguity in areas where further development would be inappropriate. The plans presented at these stages do not resemble the plans presented to the public throughout the various consultation phases prior to the Reg 18 and 19 stages. No explanation has been provided to why plans were changed at such a late stage of the development of the Local Plan. Shropshire Council declared Hadnall a Hub using the Hierarchy of Settlements methodology. Shropshire Council also stated that Hadnall was "in the third quarter of the list of 43 community hubs". The third quarter by Shropshire Councils definitions aims for 25% less development than the average 112 dwellings required in each rural area identified as a Hub. Using Shropshire Councils own figures and methodology the plan could be challenged as unsound as Hadnall should have been allocated 25% of 112 and therefore 84 dwellings not the current 125 allocated. Following this logic Hadnall would be required to build a further 11 dwellings to meet their own narrative which can be met by Windfall/infill/conversion. The preferred site in the Plan is not the preferred site locally. Alternative sites to the W and E of the village allow for a more practical and planned growth of the village. The proposed allocation was previously refused by an Inspector, and the PC concurs with the Inspector's conclusions. There is significant and historical flood risk. The access to the A49 is poor and this area of road is dangerous. Initial discussions with Shropshire Council during the early stages of consultation indicated that an even longer term strategic intent for the future direction of growth beyond the life of the plan could be developed (as indicated in the Local Plan 2016-38 Key shown on page 2 of the Wem-place-plan-area-inset-maps). Despite this initial early consultation and objections to SC's preferred site no changes to the preferred site or inclusion of strategic intent has been forthcoming.
A0474	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S8	Not Specified	Yes	Not Specified	Clive should be a Hub - The PC are suggesting that the bowling green should not be included in the HoS as an area of open space/outdoor recreation as the notice had been served to vacate the premises. However, the residents of Clive have the enjoyment of Ravenshaw's field, with is an area of open space in the centre of the village. This land was purchased by the village residents and paid through an increase in council tax. It is currently run by a group of volunteers from the village (the Ravenshaw's Field Association) and is available for hired events. It is used regularly by the local school for P.E and sports day and has 2 full-sized goalposts for anyone to play at any anytime – access is unrestricted. This facility clearly represents both an amenity green space and outdoor sports facility. Yet the Parish Council make no mention of this within their submissions. The convenience store remains as A1 retail use. Since the consultation on the Issues and Strategic Options Consultation, the former Clive Village Club has been set up as a Village Hub. This has a fully licenced bar, full-size snooker/billiards table, pool table, darts and dominoes. It is also available to book for private events/functions. The Hub holds quiz nights, bingo evenings, live music and private functions (when able to do so and restrictions permitting). This is a clear community facility that offers an array of services and supports the local and wider communities, further points should be awarded on this basis. There are also many small businesses in Clive, including 2 car repair garages. If Clive was to be dropped from Hub status, so too would all the settlements below it, a total of 17 further settlements being dropped to 'other rural settlements'.
A0475	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S8, S17.2 Hadnall	Yes	Yes	Yes	The Plan is considered sound and the accompanying evidence base is clear in how decisions and judgements were made across the board. As a Hub only a modest amount of future managed growth will be allowed, securing much needed community infrastructure, protecting the village from speculative inappropriate development via. the proposed settlement boundary. Owing to the amount of services and facilities available within Hadnall and in assessment with the hierarchy of settlements, the status of Hadnall as a Hub is appropriate and reflective of the range and services.
A0476	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	Yes	Yes	Do not have any specific objection to the overall housing requirement that is proposed and note that other representors will likely present a stronger view on whether this is sufficient or not. Clearly, if the housing requirement were to increase would welcome this outcome.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0471	B003	Re-assess the possible Sites in Much Wenlock accurately. Use the provisions of the Much Wenlock Neighbourhood Plan, preferably suitably updated to evaluate them and identify suitable Sites to meet the development target, which may involve decreasing the size of MUW012VAR	The Council considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.	No
A0472	B001	n/a	n/a	No
A0473	B001	Reinstate the development boundary and plans the public were initially consulted upon, giving key areas of the village protection from future development. address the issue and provide a response on the anomaly that, using Shropshire Councils own Hierarchy of Settlements methodology, Hadnall being in the third quarter of the list of 43 community hubs definitions has had proposed more than the 25% less development than the average 112 dwellings required in each rural area identified as a Hub. Provide an explanation as to why after such a wide reaching Local Plan review no longer term strategic intent for the 'future direction of growth' has been included despite being an option indicated in the Local Plan 2016-38 Key (see page 2 of the Wem-place-plan-area-inset-maps).	The Development Boundaries are considered appropriate for each of the Hubs in relation to their built form and areas which are appropriate for development over the plan period. There have been numerous consultations throughout this Local Plan Review, and amendments have been made between each of these based on the most recent and reliable information available. This can either reinforce Shropshire Council's stance on a site, Development Boundary etc. or ultimately result in changes being made.	No
A0474	B001	n/a	n/a	No
A0475	B001	n/a	n/a	No
A0476	B001	Welcome inclusion of a modest upward adjustment to the housing requirement, although our concerns relate to the components of the housing supply, how these have been derived and how ultimately they will be delivered.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers that it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. Assumptions regarding non-delivery rates, windfall allowances and delivery timescales for proposed allocations are considered appropriate and respond to consideration of the specific characteristics, constraints and opportunities that exist across Shropshire, in specific settlements and on specific sites.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0476	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 Shrewsbury	Yes	No	Yes	Taking into account commitments and allocations this leaves a shortfall of 505 dwellings against what is needed and which the Council have identified are expected to come forward as windfalls. We have previously commented on this matter, expressing our concern about relying on windfalls to come forward when there are available suitable sites in the SLAA and Site Assessment paper that have not been allocated. The land at Whitehall, Monkmoor Road is one such site that is included in the SLAA and which is considered suitable for development and would make a contribution to meeting the housing needs of the town and wider District. By relying on windfalls to deliver the housing needs of the District, this can result in uncertainty and a lack of clarity about how and where they are to be delivered. In turn this has a knock-on effect to planning for the location of jobs, services and the infrastructure that are required to support the growing population and which are key objectives to be delivered through the Plan.
A0476	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1	Yes	No	Yes	In light of our comments to Policy S16 we object to the omission of the land at Monkmoor Road, Shrewsbury as a housing allocation in the Plan. The site is previously developed land within the urban area and is therefore considered an ideal site to be allocated for residential development. The site is given a 'Good' rating in the Sustainability Appraisal and is identified a suitable housing site in the Site Assessment paper. It is still the case that the site is expected to become vacant in the near future, with the existing occupier choosing to vacate the site. In redeveloping the site, a number of potential benefits of a residential scheme on this site have also identified, including better amenity for the surrounding residential occupiers; the opportunity to enhance the setting of adjoining Listed Buildings; and securing the occupation of redundant and vacant Listed Buildings within the site. As, such we can see no reason not to allocate the site with a view to delivery in years 6-10. In light of the site's omission from the Plan we consider it is unsound on the basis that the Plan will not be effective in meeting its housing needs over the Plan Period and that by allocated additional housing sites greater certainty will be provided that the housing requirement will be met
A0477	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2 WBR007 & WBR008	Not Specified	Not Specified	Not Specified	There is a need for 2 & 3 bedroomed properties in the area for families and younger people. There is a school, shop, pub, village hall and importantly a doctors here and it is important to keep these going and supported. But these families need safe pedestrian access to these places. If you need to cross the road at the Back Lane turning it is blind and there is already a severe speeding issue with traffic in the vicinity. There isn't a safe pavement for people to get to the above mentioned places and in a number of locations it does narrow to less than half a metre. People will have to cross the road around the vicinity of the Old Post Office due to a lack of pavement. There is limited vision and with speeding traffic there have been many near misses and earlier this year sadly a fatality. I would imagine that if there were not at least two safe crossings available then families would be forced into using cars for these short distances adding to local pollution and to traffic at busy times. There is already an issue with parked cars in the vicinity of the school on the B4386. The speeding traffic which enters Worthen from the Shrewsbury direction in the Little Worthen area would need some calming measures installed. Currently many vehicles ignore the 30 mph signs and don't slow down until the bend. Something needs to be done to help prevent collisions. Even extending the 30 mph zone might not have the desired effect. There has been significant flooding on the road between this site and just before Little Worthen. I feel that this proposed site will only add to the problem. I believe there were initially 30 properties allocated in this settlement of around 148 houses. With all the proposals on both sites and other infill areas it brings the total to around 55 which is <b>exceptionally big for a small rural community to absorb.</b>
A0477	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2 WBR010	Not Specified	Not Specified	Not Specified	As with most rural communities there is a need for affordable housing and 2 / 3 bedroomed properties. Under new legislation I believe there will be no planning permission for developers to go through, therefore giving them the opportunity to build what they want and naturally the 4 / 5 bedroomed executive style housing would give them a greater profit. Of course we need new families in the area to support the school, doctors, village hall, shops, pub etc. Families in these new developments would need safe pedestrian access to the said establishments. In places the pavement is narrower than half a metre. Pedestrians would need to cross the busy road if they were to access facilities at either end of the village. There is a well documented speeding issue through the village which has deteriorated since the early part of this year during lockdown. Over the years the Road Safety Camera Van has visited regularly. This site includes the site next to Millfield House which has already been turned down on appeal by the planning inspector. It was deemed to be out of character with that part of the village. It would impact on the settlement view from the Area of Outstanding Natural Beauty. The planning appeal statement upheld refusal of planning application. The site originally was for 25 houses. This site is vast and could easily double or triple this number. If the developers had their own way I feel this could happen. It would be unacceptable. Safety and environmental issues could be overlooked in favour of profit if they were not included in the development. There have been several near misses and a recent fatality in the last year. There is a significant sewage problem in the village in this area. Water runs off the field using flooding and backing up towards Brockton and beyond. A large introduction of new housing would further add to this. If any development was to be introduced to the village on this site it should stay in character with this part of the village and be linear in nature. The site should be greatly reduced in order to prevent a sprawling development. I think the rest of the field is not included so this reduction should not be a problem. Without safe pavements and crossings it is feared that pedestrians will use their vehicles to get around to the various places in the village, adding to air pollution, adding to parking problems and adding to the risk of further accidents with the increased traffic.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0476	B002	It is our view that suitable and sustainable sites that meet the both the objectives of the Framework and now published Big Town Plan should be allocated, including land at Whitehall, Monkmoor Road which is owned by TT and is identified as a suitable site in the Site Assessment paper. In doing so, it would reduce the windfall allowance and increase certainty over delivery of sufficient houses to meet the need identified in the town and towards meeting needs across the County. This site will allow for 88 dwellings and lessen the dependency on unplanned windfall development.	Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of the component sites of this site promotion.	No
A0476	B003	Include the site at Monkmoor Road as a housing allocation	Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of the component sites of this site promotion.	No
A0477	B001	N/A - Reg-18 consultation form completed instead of Reg-19 Consultation Form	All the proposed site allocations in Worthen have been informed by a proportionate and robust site assessment process, which included considerations of highways impact and flood risk.	No
A0477	B002	N/A - Reg-18 consultation form completed instead of Reg-19 Consultation Form	All the proposed site allocations in Worthen have been informed by a proportionate and robust site assessment process, which included considerations of highways impact, effect on the Shropshire Hills AONB and flood risk.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0478	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2 WBR007 & WBR008	Not Specified	Not Specified	Not Specified	Welcome new housing in the village, but the amount proposed is too many for the current size of the village to absorb. New families will be welcome, to keep the local amenities, like the doctor's, pub, village hall, shop, school and churches, thriving. To be able to move around the village safely to these different venues is difficult as pedestrians would have to cross the road and in most of the potential crossing places, there is very limited visibility. Speeding traffic has been a well documented issue over the last few years. The Road Safety Camera Van is a regular visitor to the village. As well as many near misses when crossing the road or even walking along the pavement, there has also been a recent fatality. Pavements are quite narrow in places, less than half a metre wide, so parents with child buggies etc, sometimes have to go into the road to negotiate their way along. It would possibly force many families to take to their vehicles to get the short distance from one end of the village to another, increasing air pollution and adding to already difficult and unsafe parking, especially in the vicinity of the school. Adding safe crossings is difficult as visibility for drivers is very limited due to the bends and the undulations of the road. Where would be a safe place ? Speeding traffic from the Shrewsbury direction into Little Worthen despite speed restrictions is still an issue. It is only the bend that slows traffic down. Some important traffic calming measures would need to be installed. Also there is a significant issue with flooding on the road between this site and Little Worthen. The site may add to this issue unless things are taken into consideration in the planning.
A0478	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2 WBR010	Not Specified	Not Specified	Not Specified	Although the village does need infill housing of a 2/3 bedroomed nature, affordable housing, bungalows for the ageing population, the proposed level of up to 55 dwellings on this and another site within the village would be unacceptable. There would be far too many for this tiny village, which currently consists of less than 150 dwellings, to absorb. With the current situation where developers would not have to go through planning, there is always the case that developers would maximise the number of properties on the site for financial gain. There would be a high percentage of 4/5 bedroomed executive style houses, which is just what the village doesn't need. Obviously some housing is needed to continue to maintain the numbers of people in the village to allow the school, doctor's, pub, shop, village hall and pub to thrive. It would not be environmentally friendly to have all the extra vehicles within the village. As pedestrian access to all the above mentioned venues is limited and in places dangerous, it could force residents to take to their cars to drive from one end of the village to another to access amenities. Again parking these vehicles would be an issue. There is already a speeding issue in the village which has been well documented over the years. The Road Safety Camera Van regularly visits. Many near misses have occurred with pedestrians trying to cross the road and sadly there has been a recent fatality. There are not pavements on both sides of the road so crossing is inevitable. In several places the pavement is less than half a metre wide. Taking children to school, and walking with prams and buggies is also a safety issue. Parents need to hold their child's hands for safety and often have to walk in the road. There are people with mobility scooters who need access to the doctor's, village hall and shops. Where to site any crossings in the village is another issue, with high traffic speeds, overtaking and poor visibility for cars and pedestrians. This site next to Millstream House has already been turned down on appeal by the planning inspector as out of character with that part of the village and impacting on the settlement view from the AONB. Initially there were plans for 25 dwellings on this site. It could hold triple that number. With the recent government white paper recommending more housing and developer control on development sites, this could lead to even greater over-development of the village. This would be unacceptable. Far too many new dwellings for a tiny village to absorb. There is a flooding and sewerage issue from this site. There are well documented flooding problems with flood water and sewerage backing up to Brockton and beyond. This site, if used, therefore should be greatly reduced to prevent a sprawling development. Any development on this site should stay in character with this part of the village, which is linear. There would be safety issues for pedestrians and vehicles emerging from this site onto the main road. There is no space to put a pavement on that side of the road so pedestrians would have to cross the road immediately, to access the school, doctor's, village hall and pub. There would also be safety issues for emerging vehicles due to the speed of oncoming traffic. Safety and environmental issues should not be overlooked if these are not included in this development.
A0479	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	Hierarchy of Settlements 2020 - Para 5.41 a) This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities. The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space, etc. cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed. b) Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in any Community Hub That is contrary to the "Spatial Vision" and SP3 Climate Change which seeks to minimise travel and maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria. Trefonen is the only proposed Hub settlement with neither of these key requirements, and so its designation as such is "unsound". Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.
A0479	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.1 Oswestry OSW017	Not Specified	Not Specified	Not Specified	Policy S.14.1(i) Residential Allocations Site OSW017 Land at Trefonen Road, Oswestry This site, allocated for Open Market development of 30 dwellings, will compound traffic congestion, with its inherent safety and health issues, outside schools on Upper Brook Street & Trefonen Road. When considered with the additional traffic from 50 additional dwellings proposed for Trefonen (which has no employment or peak time public transport) this increased pressure on existing restricted infrastructure will be unsustainable, and also increase pollution & carbon emissions from queuing, contrary to policy SP3 Climate Change

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0478	B001	N/A - Reg-18 consultation form completed instead of Reg-19 Consultation Form	All the proposed site allocations in Worthen have been informed by a proportionate and robust site assessment process, which included considerations of highways impact and flood risk.	No
A0478	B002	N/A - Reg-18 consultation form completed instead of Reg-19 Consultation Form	All the proposed site allocations in Worthen have been informed by a proportionate and robust site assessment process, which included considerations of highways impact, and flood risk.	No
A0479	B001	Trefonen should be removed from the Community Hub settlements in Policy S14.2 Community Hubs – Oswestry Place Plan Area and Schedule SP2.2: Community Hubs. It should be a Rural Settlement.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen.</p> <p>Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.</p> <p>As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.</p>	No
A0479	B002	Remove site OSW017	No action needed - OSW017 has already been removed as a preferred allocation	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0479	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	Para 2 Housing Requirement - target of 30,800 Explanation Para 3.5, Para 3.6 and Para 3.7 This target is 19% in excess of the identified need of 25,894 for Shropshire. The Council is still pursuing its "highly ambitious" High Growth target. The incorporation of 1500 dwellings for the emerging Black Country Plan places an additional burden on Shropshire during the Plan period for the delivery of that additional supply to be provided as part of the annual 5 Year Housing Supply assessments. Both of these factors increase the risk of an "out of date" Plan due to economic fluctuations between now and 2038, completely outside the control of the Council. Additionally the Covid-19 pandemic has had short term effect on construction and its long term impact on the economy and growth is unknown. The impact on consumer demand for housing will be financial lead whilst in turn supply by developers is profit led. Despite Government exhortations to "Build" the funding for Local Authority housing is limited and the supply is majority private sector. It is established fact that whenever there is a lack of demand housing is not built, but developers pursue consent on otherwise unattainable land An "out of date" Plan holds that inherent risk of exploitation by developers & landowners to gain consent for open market housing on sites not identified in the Plan, which will be contrary to the aims of "Right Homes in Right Place" in the Draft Housing Strategy 2020-2025. By the next Partial Review (5yearly) the repercussions of the pandemic will be clearer, and the Housing Target can be adjusted to suit the new circumstances then, rather than increasing now when a downturn in demand & supply is widely predicted. In view of the changed world circumstances we would again ask that the 15% "High Growth" Target is reconsidered by the Council, and changed to a more deliverable "Moderate Growth" 5% above identified needs to avoid a potential "out of date" Plan in the coming years. Black Country Plan housing provision. We acknowledge the requirement for cross boundary co-operation with neighbouring authorities. Our concern is the incorporation of the additional 1500 homes into the overall Shropshire Housing Target. This will increase pressures on settlements across the county for the supply of 'out of county' needs unless sites or location close to that region can be identified. If the aim is to supply housing for residents of the Black Country surely these must be located close to that area, and not anywhere across the whole county.
A0479	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Trefonen	Not Specified	No	Not Specified	1) Designation of Trefonen as a Community Hub settlement Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6. Trefonen has no "significant employment opportunities; or "peak time public transport" It is the only proposed Hub settlement with NEITHER of these KEY requirements. Trefonen should be designated "Other Rural" settlement - for which it meets the full criteria. Without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in Trefonen. Walking or cycling to Oswestry are not safe or practical alternatives. That is contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is also contrary to the Draft Local Plan "Spatial Vision" and SP3 Climate Change which seek to minimise travel & maximise trips by sustainable travel. Therefore the status of Trefonen as a "Community Hub" is contrary to existing & proposed policies, & is therefore "unsound". It should be designated "Other Rural" settlement, for which it meets the full criteria. 2) Settlement Boundary Maps - Trefonen Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6 and should be designated as "Other Rural" settlement. Therefore it should not have a new defined Settlement Boundary. 3) Appendix 5: Residential Development Guidelines and Residential Supply Page330 Trefonen Development Guideline 55 dwellings / Windfall Allowance 50 additional dwellings That is a build rate of 3 per year and a 15% expansion of the village of 324 existing dwellings. This is not "similar" to the recent rate and cannot be considered to be a "modest amount". The proposed growth would be excessive for the scale, layout, topography, historical assets and character of Trefonen. No consideration has been given to the protection of the Setting of Offa's Dyke - a Scheduled Monument which runs right through the village and is subject to visits from tourists. Multiple "small" developments to reach a "guideline" of 50 additional dwellings would have a cumulative impact amounting to the same, or arguably greater impact, as a large development over the course of time. Therefore, the guideline should be reduced to that required to meet "identified local needs" for truly "Affordable Homes" for local people at a guide rate of 1per year – Guideline 18 Windfall Affordable Homes.
A0480	B001	Sustainability Appraisal	Page 22, SHR173, S16b	No	No	Not Specified	I refer to Site SHR173 in particular. The criteria given on Page 22 of SA Site Assessment Process: Cover and Summary document is not correct. This site is within 500 metres of the Old River Bed SSSI - in fact the north-eastern part of the site is just across the road from it (30 yards or so). The Old River Bed SSSI is one of the most important nature conservation areas in Shropshire and the area of river bed just to the west of Ellesmere Road, to the north of SHR173 is of similar character. The draft local plan has failed to properly assess its relationship to the SSSI or to other parts of the old river bed to the north or to correctly record the landscape as being of exceptionally high character. Some limited housing to meet local needs might be desirable at this location but the size of SHR173 is clearly far too large and needs to be redrawn taking better account of the local environment, amenity value, wildlife corridors including protected bat colonies at Hencote to the north, transport capacity and impact on CO2 emissions.
A0481	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole document	Not Specified	Not Specified	Not Specified	We have read the plan with interest but have no specific comments to make on the policies or proposals included. Ongoing discussions between Shropshire and Herefordshire Councils throughout the plan process have confirmed that there are no strategic cross boundary issues to be resolved. This will be reflected in a Statement of Common Ground (SoCG) between the two authorities, due to be finalised shortly.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0479	B003	Reduce the proposed housing requirement and reconsider when the draft Shropshire Local Plan is next reviewed. Review proposed contributions to the unmet need arising within the Black Country.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0479	B004	Trefonen should be removed from the Community Hub settlements in Policy S14.2 Community Hubs – Oswestry Place Plan Area and Schedule SP2.2: Community Hubs. It should be a Rural Settlement.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment. As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.	No
A0480	B001	Page 22 of the document and the criteria relating to site SHR173 should be altered to reflect that the site is within 500 metres of the Old River Bed SSSI and additionally very near landscape of high amenity value, a noted wildlife corridor with protected bat colonies in the trees to the north of the old river bed at Hencote. To be compliant, site SHR 173 must be redrawn on a much smaller scale, to more closely reflect the proximity of the SSSI, wildlife corridors and amenity value of the land to the north and north east of the site.	The landscape and visual sensitivity for housing on this site are medium for housing and medium low respectively, so the SA is correct. A site's proximity to an area of higher sensitivity is not evaluated as part of the SA.	No
A0481	B001	n/a	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0482	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Not Specified	Not Specified	Not Specified	Note the draft Shropshire Local Plan contains locally specific policies and site allocations to complement existing allocations. Also note that upon adoption policies would replace those in the currently adopted Local Plan (except site allocations yet to be delivered). Consider further transport evidence for the draft Shropshire Local Plan is needed. Working closely with Shropshire Council to understand cumulative transport implications of proposed site allocations. This will include assessing cumulative and individual impacts of proposals upon the ability of road links and junctions affected to accommodate forecast traffic flows in terms of capacity and safety. Expect to be consulted imminently on a Model Specification Report (MSR) for modelling work proposed to be undertaken by the Council as part of the draft Shropshire Local Plan and for this modelling work to inform a Statement of Common Ground (SoCG). Where draft Shropshire Local Plan proposals are anticipated to have an impact on the operation of the Strategic Road Network (SRN) in the area, note wording of draft Policies have been amended to include requirement for a Transport Assessment for each site allocation, to determine the extent of any adverse impacts (including cumulative impacts) on the smooth functioning of the SRN in the area. Content with the inclusion of this wording in principle; however, we would recommend exclusion of "cumulative impacts". Instead, recommend a Transport Assessment will be needed for each site allocation, agreed through site specific pre-application consultation with Highways England. At the planning application stage the Transport Assessment will be reviewed in accordance with paras 21-50 of the DfT Circular 02/2013 - Strategic road network and the delivery of sustainable development. Where appropriate, conditions may be agreed to offset any unacceptable impacts that may be identified through the assessment process.
A0483	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	Yes	No	Yes	The local plan's employment provisions and proposal are not opposed by our clients. However there is very real concern that the plan fails at this important time to clarify the provisions to be applied to any particular allocated development when it is to be considered as a planning application. Consequently the plan is unsound because the proposals could cause harm to existing developments and interests if not appropriately addressed. In allocating land for development, or taking forward previously allocated but unimplemented development sites as safeguarded through this plan, the opportunity must be taken to consider and assess all critical local issues which comprise material considerations to be considered at application stage. It is possible general harm can be predicted now and appropriate mitigation should be encompassed within the local plan. The NPPF provides clear guidance on decision making and this need not be repeated in the local plan, but the new document must demonstrate that provisions of the NPPF taken as a whole will be applied at the time of individual decision making. The plan makes numerous references to the NPPF, but there is no overt reference to NPPF paragraph 182, which safeguards existing business interests by requiring new development not to place unreasonable restrictions on neighbouring land uses. In our experience this is a matter frequently left to individual planning applications, when it is difficult for planning authorities to resist the prospect of new employment opportunities, and the decision balance is tilted unfairly in the favour of promised new employment over existing business activity. It is a question of ensuring neighbouring uses are compatible. While paragraph 3b of proposed Policy SP13 requires new uses or the intensification of existing uses to conform with neighbouring uses, it does not cover those situations, such as with our clients' business, where the uses are not similar in type or operation and where, with an inappropriate operation introduced, the neighbouring uses could be in conflict. By way of example our clients operate an equestrian business on land north of the A53 at Market Drayton lies alongside an area of safeguarded employment land. It is quite possible for that land to be developed for employment purposes without any harm to our clients operation. However, the 'wrong type of employment' such as one generated noise and disturbance, could have a catastrophic impact on our client's operation of breeding horses, potentially forcing it out of business. The situation can be repeated in many other locations where adjoining land uses are inappropriate, but can be avoided with foresight in local plans where allocations are brought forward.
A0484	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032	No	No	No	Do not consider road infrastructure (narrow; prone to flooding; parts are without pedestrian footways; and poorly maintained) or schools (oversubscribed) are sufficient to support proposed allocation PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032. Park Hall lacks local amenities and development of PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032 would double its size. The proposals for PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032 represent overdevelopment. A pond at the bottom of PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032 floods and has protected newts.
A0485	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1	No	No	Yes	Hollins Strategic Land gained planning approval for TIL001 in December 2020. The land hatched out on plan S18 Whitchurch - Tilstock wrongly includes part of the cemetery and war memorial, and leave out the Vicarage and land to the east [attached plan in rep]



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0482	B001	Where draft Shropshire Local Plan proposals are anticipated to have an impact on the operation of the Strategic Road Network (SRN) in the area, site guidelines include requirement for a Transport Assessment for each site allocation, to determine the extent of any adverse impacts (including cumulative impacts) on the smooth functioning of the SRN in the area. Content with the inclusion of this wording in principle; however, recommend exclusion of "cumulative impacts". Instead, recommend a Transport Assessment will be needed for each site allocation, agreed through site specific pre-application consultation with Highways England. At the planning application stage the Transport Assessment will be reviewed in accordance with paras 21-50 of the DfT Circular 02/2013 -Strategic road network and the delivery of sustainable development. Where appropriate, conditions may be agreed to offset any unacceptable impacts that may be identified through the assessment process.	Shropshire Council and Highways England have undertaken effective duty to cooperate discussions throughout the Local Plan Review process. This will continue to occur to inform highway modelling for Shrewsbury, which is being undertaken to provide further transport evidence to support the draft Shropshire Local Plan. Shropshire Council is also committed to continued positive engagement with Highways England during the eventual implementation of the draft Shropshire Local Plan. We note the comments regarding proposed site guidelines for sites where the draft Shropshire Local Plan proposals are anticipated to have the potential to impact on the operation of the Strategic Road Network (SRN) in the area. As such, to ensure clarity and consistency with Highways England best practice, we are proposing a series of minor modifications to: 1. Amend the relevant site guideline for these sites to state: "Any necessary improvements to the local and strategic road network will be undertaken, informed by an appropriate Transport Assessment", or words to this effect. 2. Within para 1 of draft Policy DP28. Communications and Transport we will include the sentence: "As such, unless agreed otherwise with Shropshire Council, a Transport Assessment will be undertaken for relevant site allocations in this Local Plan, the scope of which will be agreed through site specific pre-application consultation with Highways England."	Yes
A0483	B001	We suggest that to become sound Policy SP13 3(b) need be amended only slightly to explain fully what is meant by conformity; not simply that a new development is similar to adjoining developments, but that any new development and operation must be cognizant fully of its potential impacts on all adjoining land uses. It should specify that inappropriate uses will not be permitted if any degree of harm identified, cannot be appropriately mitigated. The policy and or supporting explanation should clarify that any new development adjoining existing land uses will be expected to conform to a mode of operation that meets fully the principles included in the NPPF at paragraph 182.	Shropshire Council considers that Policy SP13 and the employment development strategy for Shropshire is appropriate, effective, sustainable and deliverable. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local Plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. The issues arising from the conformity of proposed uses with the existing land use in a locality are addressed in Policy SP13 in criteria 3 in relation to neighbouring uses and the broader requirements of national and local policies, 5 in relation to other policies of the Local Plan determining location and land use, and 6 in relation to the scale of the development and the broader economic growth objectives. Where the issue of conformity is not resolved through these requirements then criterion 7 would require further evidence to be submitted to justify an otherwise 'non-conforming' use.	No
A0484	B001	Widen and better maintain roads (including flood defences for Burma Road) and extend pedestrian links. Provide new schools and shopping facilities to support development proposals. Reduce the level of development proposed to better reflect the existing area.	Noted. Shropshire Council considers that the proposed development strategy for Oswestry/Park Hall and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans. Draft site guidelines for proposed allocation PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032 include "Any necessary improvements to the local and strategic road network will be undertaken..."	No
A0485	B001	Site TIL001 should be hatched out in accordance to the approved plan. It would also make logical sense to include the land to the south of the development within the Shropshire Local Plan (see attached plan Land to the south of 20.02640.REM). This site can be accessed from the already approved TIL001 and create a defined southern edge to Tilstock. The plan referenced above shows land associated with the Reserved Matters application 20/02640/REM outlined in red which is the reserved matters application for 26 dwellings, the blue outlined area shows the land within application 20/04375/FUL, which refers to the formation of an attenuation basin in connection with residential development under planning application reference 20/02640/REM and the yellow edged area shows land that could be brought forward for residential development through this plan. The site is very contained, with the land to the north being built out this year offering 26 dwellings, to the east is a lane with the hedgerow continuing from the northern site. To the south the site borders a public footpath and to the west the site shares the border with a farm. The site could offer circa 25-30 dwellings.	TIL001 is an existing allocation within the SAMDev Plan. The draft Policies Map accurately reflects the extent of this existing allocation.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0486	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1 Market Drayton MDR014	Yes	Yes	Yes	n/a
A0487	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	No	Not Specified	<p>If the Council wishes to apply the optional NDSS to new build dwellings, this should only be done in accordance with para 127f &amp; Footnote 46 of the National Planning Policy Framework (NPPF). Footnote 46 states “policies may also make use of the NDSS where the need for an internal space standard can be justified”. As set out in the NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). Therefore, a policy requirement for NDSS for all affordable housing must be justified by credible and robust evidence.</p> <p>Before adopting the NDSS for all affordable housing, the Council should provide a local assessment evidencing its case. The Council has not demonstrated in its supporting evidence the need for all affordable housing to meet NDSS. The Council’s evidence only identified overcrowding in 11% of social rented accommodation (para 4.11) as opposed to all affordable housing tenures. The Council also suggested that such overcrowding may be an unintended consequence of the “bedroom tax” (para 4.13) rather than a systemic problem to resolve. The NDSS should only be introduced on a “need to have” rather than a “nice to have” basis. An inflexible policy approach to NDSS for all affordable housing will impact on affordability and effect customer choice for affordable homeownership products such as First Homes. The introduction of the NDSS for all dwellings may lead to customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs. This may lead to the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should assess any potential adverse impacts on meeting demand for First Homes and other affordable homeownership products, which may adversely slowdown affordable housing delivery rates of sites included in the housing trajectory.</p> <p>If the Government implements proposed changes to Part M of the Building Regulations as set out in the “Raising Accessibility Standards for New Homes” consultation, which closed on 1 December 2020, the Council’s amendment to Bullet Points 4 &amp; 5 of Policy DP1 will be unnecessary. In the meantime, if the Council wishes to adopt the optional standards for accessible &amp; adaptable dwellings, then this should only be done in accordance with para 127f &amp; Footnote 46 NPPF and National Planning Practice Guidance (NPPG). The existing housing stock (146,126 dwellings in 2019) is considerably larger than the new build sector (only 0.8% annual addition to existing stock) so adapting the existing stock is likely to form part of the solution. The optional standards should only be introduced on a “need to have” rather than a “nice to have” basis. It is important to note that not all health problems affect a household’s housing needs therefore not all health problems require adaptations to homes. New housing standards are not usually available in the older existing housing stock and benefit less able-bodied occupants. M4(1) standards are likely to be suitable for most residents.</p> <p>The Council state that the requirement for M4(3) is for a wheelchair adaptable home (which includes features to make a home easy to convert to be fully wheelchair accessible) rather than a wheelchair accessible home (which includes the most common features required by wheelchair users) (para 4.34). This distinction should be set out in the policy wording rather than in the supporting text.</p> <p>The LPR should ensure that suitable sites are available for a wide range of developments across a wide choice of appropriate locations. There is no rationale for the selection of 50 dwellings as the threshold for qualifying development proposals. The policy approach to the proportion, type and tenure of older persons housing is unclear, ambiguous and defers negotiation of the precise scale and type of older persons and specialist housing on all developments of 50 or more dwellings to the planning application process. The vagueness of this Bullet Point causes uncertainty and means that neither the applicant nor the decision maker know the Council’s expectations from a development proposal.</p>
A0487	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	No	Not Specified	<p>Policy DP3 requires new residential development of 5 or more dwellings in Designated Rural Areas and 10 or more dwellings elsewhere to provide onsite affordable housing of 10% in the north and 20% in the south as defined by geographical areas in Figure DP3.1. Onsite affordable housing tenure to comprise of 70% social or affordable rent accommodation and 30% intermediate or other affordable housing unless local need evidence indicates otherwise.</p> <p>The Council’s own viability assessment identified viability challenges across the County and the cumulative impact of proposed policy requirements threatens housing delivery (see HBF response under Deliverability &amp; Viability). A differentiated policy approach to affordable housing provision across the County is justified. The 2019 NPPF promotes affordable home ownership by requiring at least 10% of new dwellings built to be available for this tenure leaving only the remainder for other affordable housing tenures (para 64). The Council’s policy approach to affordable housing tenure is inconsistent with national policy. The Government’s Changes to the Current Planning System (ended on 1st October 2020) and The Government’s consultation on Draft Revisions to the NPPF (ending on 27th March 2021) also propose further changes to delivering First Homes.</p>
A0487	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Not Specified	No	Not Specified	<p>Under Bullet Point 3, all development delivers at least a 10% net gain for biodiversity in accordance with the Environment Act, any future Local Nature Recovery Strategy (LNRS) and Policies DP14, DP15, DP16 and DP22. It is the HBF’s opinion that the Council should not deviate from the Government’s proposals on biodiversity gain as set out in the Environment Bill. This legislation will require development to achieve a 10% net gain for biodiversity. It is the Government’s opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. 10% will be a mandatory national requirement, but it is not a cap on the aspirations of developers who want to voluntarily go further. The Government will use the DEFRA Biodiversity Metric to measure changes to biodiversity under net gain requirements established in the Environment Bill. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays. The Council should not specify a requirement above 10%. The prefix “at least” in Bullet Point 3 of Policy DP12 should be deleted. The Council’s policy approach should not compromise the viability of development (see detailed HBF comments on Deliverability &amp; Viability). The Government will make provision in the Environment Bill to set a transition period of two years. The Government will work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, and will provide clear and timely guidance on understanding what will be required and when.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0486	B001	n/a	N/A	No
A0487	B001	<p>With regard to draft Policy DP1:</p> <p>-The requirement for NDSS for all affordable housing is unjustified and Bullet Point 3 should be deleted. If this retained, the Council should include transitional arrangements as land deals underpinning residential sites may have been secured prior to any proposed introduction of NDSS and these sites should be allowed to move through the planning system before any proposed policy requirements are enforced. As such NDSS should not be applied to Planning Applications approval prior to a specified date.</p> <p>-Bullet Points 4 &amp; 5 of Policy DP1 should be deleted.</p> <p>-Bullet Point 6 should be deleted. An alternative policy approach to support older persons and specialist housing, where it's well-located in respect of services &amp; facilities, would be a positive, proactive and proportionate ways of meeting need for older persons housing. It is also noted that the SHMA Report identifies that 14.3% of Shropshire's existing housing stock are bungalows (para 3.144) substantially exceeding the national (England 9.4%) and regional (West Midlands 7.6%) provision of bungalows, which are often occupied by older households.</p>	<p>Noted. The approach to nationally described space standards proposed within Para 3 of draft Policy DP1 is considered to positively respond to the evidence available within the Strategic Housing Market Assessment (SHMA) and other sources. Providing dwellings with sufficient internal floorspace positively contributes to the future occupier's ability to achieve a high-quality of life and is responsive to changing household requirements, by increasing the ability to include adaptations at a later date.</p> <p>With regard to M4(2) and M4(3) housing, the SHMA identifies that growth in the number of older persons' households is a key feature in the population and household change projected to occur in Shropshire over the Local Plan period from 2016 to 2038. It calculates a total need for M4(2) and M4(3) housing equivalent to 77% of total household growth (of which M4(3) constitutes around 13%). It is recognised that part of this need can be met within specialist accommodation, however Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible. As such Shropshire Council considers the SHMA justifies the proposed thresholds for M4(2) and M4(3) standard dwellings. It is also considered appropriate to provide the explanation of the distinction between wheelchair accessible and wheelchair adaptable housing within the proposed explanation rather than the draft policy.</p> <p>With regard to the requirement to provide housing for older people, the National Planning Policy Framework (NPPF) specifies that housing needed for different groups in the community should be assessed and reflected in planning policies, this includes the needs of older people. The SHMA indicates that growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the proposed Local Plan period from 2016 to 2038. It also identifies a specific need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision. In order to ensure the needs of older people are met all residential development is expected to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. However it is considered appropriate to specifically require larger sites of 50 or more dwellings to include an appropriate range of specialist housing designed to meet the diverse needs of older people as this will ensure inclusive and sustainable communities. However, it is recognised that sites of 50 or more dwellings will be diverse in nature. It is for this reason that a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors.</p>	No
A0487	B002	The Council's affordable housing tenure mix set out in Policy DP3 should be amended to accord with national policy.	<p>Noted. Shropshire Council considers that the proposed tenure split effectively responds to evidence on affordable housing needs, as summarised within para 4.52 of the explanation to draft Policy DP3 of the draft Shropshire Local Plan. It also provides flexibility for alternative tenure splits where local need would support this.</p> <p>It is evidenced that there is significant need for affordable housing for rent in Shropshire, the delivery of which would be prejudiced by the application of a standard 10% affordable home ownership requirement. The draft policy approach to tenure thus complies with NPPF (para 64) which expects at least 10% of the homes to be available for affordable home ownership, "unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs".</p>	No
A0487	B003	It is the HBF's opinion that the Council should not be setting biodiversity gains greater than 10% or deviating from Government proposals set out in the Environment Bill including transitional arrangements. The cross referencing to other Development Management Policies is confusing, which should be deleted. Policy DP12 should be modified by the Council.	The requirement for a 10% net gain for biodiversity reflects the provisions of the Environment Bill and the Council thus considers it to be appropriate	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0487	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP27	Not Specified	No	Not Specified	Under Policy DP27 Bullet Point 3a, residential developments will be expected to deliver gigabit-capable broadband infrastructure using “fibre to the premises” technology wherever practical (provision in residential developments of less than 10 dwellings may be subject to viability constraints) or under Bullet Point 3b alternative gigabit-capable technologies where justified for reasons including viability, distance from the network or other constraints preventing “fibre to the premises”. Under Bullet Point 4, residential developments will also deliver passive ducting wherever possible, to facilitate the delivery of competitive fibre broadband services. The Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations. In the Budget (11th March 2020), the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The Government will amend Part R “Physical Infrastructure for High Speed Electronic Communications Networks” of the Building Regulations 2010 to place obligations on housing developers to work with network operators to install gigabit broadband, where this can be done within a commercial cost cap. The Department for Culture, Media and Sport (DCMS) has outlined its intentions on the practical workings of this policy, which will apply to all to new builds. Any type of technology may be used, which is able to provide speeds of over 1000 Mbps. All new build developments will be equipped with the physical infrastructure to support gigabit-capable connections from more than one network operator.
A0487	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	The determination of the minimum number of homes needed should be informed by a LHN assessment using the Government’s standard methodology unless exceptional circumstances justify an alternative approach (para 60). In Shropshire, there are no exceptional circumstances to justify an alternative approach. Using the standard methodology, the minimum LHN for Shropshire is 1,177 dwellings per annum equivalent to 25,894 dwellings over the plan period 2016 – 2038. In Shropshire, there is justification for a housing requirement above the minimum LHN. The Council should also recognise economic benefits of housing development in supporting local communities as highlighted by the HBF’s latest publication Building Communities – Making Place A Home (Autumn 2020). The Council should calculate its affordable housing need as defined by the NPPG. This figure may be significant in comparison to the minimum LHN. A higher overall housing requirement will contribute towards delivery of a greater number of affordable homes. It is acknowledged that the Council may not be able to meet all affordable housing needs but an uplifted housing requirement above the minimum LHN will make some contribution to meeting affordable housing needs. The NPPG does not set any limitations on a higher figure, which is a matter of judgement. The HBF believe that the Council should have been more ambitious.
A0487	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3 & DP11	Not Specified	No	Not Specified	By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises. The HBF support moving towards greater energy efficiency via a nationally consistent set of standards and a timetable, which is universally understood and technically implementable. The Government Response to The Future Homes Standard consultation confirms that the Planning and Energy Act 2008 will not be amended, which means that the Council will retain powers to set local energy efficiency standards for new homes. The HBF acknowledges that the Council may stipulate energy performance standards that exceed the Building Regulations but consider that the Council should comply with the Government’s intention of setting standards for energy efficiency through the Building Regulations. It is the HBF’s opinion that the Council should not be setting different targets or policies outside of Building Regulations. The key to success is standardisation and avoidance of individual Council’s specifying their own policy approach to energy efficiency, which would undermine economies of scale for product manufacturers, suppliers and developers. As set out in the Planning for the Future White Paper a simpler planning process improves certainty. The higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and Future Homes Standard means that the Council should not need to set local energy efficiency standards in order to achieve the shared net zero goal. The Council’s policy approach should not compromise the viability of development, additional costs for Future Homes Standard Option 2 should be included in the Council’s viability assessment (see detailed HBF comments on Deliverability & Viability).
A0487	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3 & DP20	Not Specified	No	Not Specified	Strategic Policy SP3 - Climate Change requires :- <input checked="" type="checkbox"/> Bullet Point 4d - integration of water efficiency measures. The Council is committed to an overall goal of making Shropshire net greenhouse gas neutral by 2030. It is the HBF’s opinion that the Council’s policy approach to climate change should reflect the Government’s proposals on for Future Homes Standard, heat networks, electric vehicle charging points (EVCP) and water efficiency. Development Management Policy DP20 - Water Efficiency Under Bullet Point 1 new housing will be expected to meet the Building Regulations 110 litres per person per day standard for water. Under Building Regulations, all new dwellings must achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the NPPG. The NPPG states that where there is a “clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day” (ID : 56-014-20150327). The NPPG also states the “it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement” (ID : 56- 015-20150327). The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The Shropshire Water Cycle Study (2020) reports that the Environment Agency and Natural Resources Wales assess the Severn Trent and United Utilities supply regions as areas of only “moderate” water stress (para 4.6.1) rather than an area of serious water stress.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0487	B004	The Council's approach in Policy DP27 is unnecessary and repetitive of Building Regulations, Bullet Points 3a, 3b & 4 should be deleted.	Shropshire Council is working to improve broadband connectivity across the County through its Connecting Shropshire programme to attract commercial superfast broadband infrastructure investment and to bring faster broadband to areas where it is not economically viable for commercial operators to provide these services. The purpose of these objectives for connecting Shropshire to the best electronic communications infrastructure into their business premises and homes is to ensure businesses, employees and residents can embrace and optimise the use of broadband in their everyday lives. Unless the development market also embraces these objectives in their development design schemes and build specifications through the provision of network infrastructure and fibre to premises technologies then the roll out of digital connectivity will not be achieved and Shropshire will struggle in its programme to move towards and achieve the broader objective of creating a zero carbon economy in the County.	No
A0487	B005	Before submission of the LPR for examination, the Council should re-consideration its housing requirement. Policy SP2 should be amended to set out the housing requirement as a minimum figure.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0487	B006	The Council's proposed policy approach is unnecessary because of the Government's Future Homes Standard proposals. Policy SP3 Bullet Point 2a and Policy DP11 Bullet Points 1a - 1d should be deleted.	The government's Future Homes Standard will be implemented through the Building Regulations rather than the planning process. It thus provides a complementary mechanism to the Local Plan and the Council considers no change to the policy is necessary.	No
A0487	B007	The Council's policy approach is unnecessary and unjustified Bullet Point 4d of Policy SP3 and Bullet Point 1 of Policy DP20 should be deleted.	The Council considers that its Water Cycle Study sets out the clear local need for a tighter water efficiency standard than Building Regulation and that this draft policy therefore complies with national guidance. No change proposed.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0487	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3 & DP28	Not Specified	No	Not Specified	Strategic Policy SP3 - Climate Change requires:- Bullet Point 1f - wherever possible, integration of electric vehicle charging infrastructure into new development in line with Policy DP11 ; The Council is committed to an overall goal of making Shropshire net greenhouse gas neutral by 2030. It is the HBF's opinion that the Council's policy approach to climate change should reflect the Government's proposals on for Future Homes Standard, heat networks, electric vehicle charging points (EVCP) and water efficiency. Development Management Policy DP28 - Communications & Transport under Bullet Point 3d requires provision of infrastructure investment including domestic charging points in dwellings. The HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. The Department of Transport consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019) set out the Government's preferred option to introduce a new requirement for EVCPs under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW fitted with a universal socket to charge all types of electric vehicle currently on the market. The Council's policy approach should not compromise the viability of development (see detailed HBF comments on Deliverability & Viability).
A0487	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3 & DP11	Not Specified	No	Not Specified	The Council is committed to an overall goal of making Shropshire net greenhouse gas neutral by 2030. It is the HBF's opinion that the Council's policy approach to climate change should reflect the Government's proposals on for Future Homes Standard, heat networks, electric vehicle charging points (EVCP) and water efficiency. Under Development Management Policy DP11 - Minimising Carbon Emissions, new residential development will reduce the impact of climate change by :- Bullet Point 1d - encouraging all proposals in particular residential development of 50 or more dwellings to achieve zero net-carbon emissions, to use on-site district heating / cooling systems, and to connect to wider heating / cooling networks both for energy supply and export, especially where these utilise renewable energy. The Council is also referred to the Department for Business, Energy and Industrial Strategy consultation on Heat Networks : Building A Market Framework (ended on 1st June 2020). To meet the Government's legal commitment on reducing greenhouse gas emissions virtually all heat in buildings will require decarbonising. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies. Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. Research by the Competition and Markets Authority (CMA) found that a significant proportion of suppliers and managing agents do not provide pre-transaction documents, or what is provided contains limited information, particularly on the on-going costs of heat networks and poor transparency regarding heating bills, including their calculation, limits consumers' ability to challenge their heat suppliers reinforcing a perception that prices are unjustified. The monopolistic nature of heat networks means that future price regulation is required to protect domestic consumers. The CMA have concluded that "a statutory framework should be set up that underpins the regulation of all heat networks." They recommended that "the regulatory framework should be designed to ensure that all heat network customers are adequately protected. At a minimum, they should be given a comparable level of protection to gas and electricity in the regulated energy sector." The Government's latest consultation on heating networks proposes a regulatory framework that would give Ofgem oversight and enforcement powers across quality of service, provision of information and pricing arrangements for all domestic heat network consumers.
A0487	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	Not Specified	No	Not Specified	The 2019 NPPF confirms that Local Plans should avoid unnecessary duplication including repetition of policies in the NPPF itself (para 16f). The presumption in favour of sustainable development is clearly set out in the 2019 NPPF (para 11). In attempting to repeat national policy in Policy SP4, there is a danger that some inconsistencies creep in and lead to small but critical differences between national and local policy causing difficulties in interpretation and relative weighting.
A0487	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Not Specified	No	Not Specified	Under Bullet Point 2 of Policy SP5 development should be designed in accordance with the West Midlands Design Charter. The Council's policy approach to high quality design should align with the 2019 NPPF, the latest NPPG, the National Design Guide and the National Design Code. The HBF is supportive of the use of best practice guidance, however the use of such guidance should remain voluntary rather than becoming a mandatory policy requirement. The West Midlands Design Charter is not intended to set a local design policy (see para 3.36 of the supporting text of the LPR), yet all planning applications for new development must set out their compliance with Policy SP5 and the West Midlands Design Charter (see para 3.40 of the supporting text of the LPR). Policy SP5 and its supporting text should not convey development plan status onto the West Midlands Design Charter, which has not been subject to the same process of preparation, consultation and examination as the LPR.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0487	B008	The Council's policy approach is unnecessary because of the Government's proposals to change Building Regulations. Bullet Point 1f of Policy SP3 and Bullet Point of 3d Policy DP28 should be deleted. However, if Policy DP28 Bullet Point 3d is retained, the HBF consider that the physical installation of active EVCPs is unnecessary. The evolution of automotive technology is moving quickly therefore a passive cable and duct approach is a more sensible and future proofed solution, which negates the potential for obsolete technology being experienced by householders. A passive cable and duct approach means that the householder can later arrange and install a physical EVCP suitable for their vehicle and in line with the latest technologies.	The policy encourages new electric vehicle infrastructure rather than requires it ( in recognition of the role of Building Regulations in this area). As such the phrasing of the policy is considered appropriate. No change proposed.	No
A0487	B009	The Council's policy approach is ineffective, Bullet Point 2c of Policy SP3 and Bullet Point 1d of Policy DP1 should be deleted.	The Council considers that its approach to climate change in the Local Plan complements the governments Future Homes Standard proposals which will be implemented through Building Regulations. Comments on heat networks are noted.	No
A0487	B010	Policy SP4 is unnecessary, which should be deleted.	Noted. Shropshire Council considers draft Policy SP4 is appropriate and consistent with national policy. It is complemented by the wider draft Policies within the draft Shropshire Local Plan.	No
A0487	B011	Policy SP5 Bullet Point 2 should be deleted. The Council should signpost guidance in its supporting text rather than in policy.	Noted. Shropshire Council have endorsed the West Midlands Combined Authority (WMCA) Design Charter and acknowledged that this can be taken into account as a material consideration to inform planning decisions and to inform policy development, notably the review of the Local Plan. It is considered the principles established within this Design Charter are appropriate in a Shropshire context. This aspect of draft Policy DP5 is complemented by the remainder of draft Policy DP5, the other draft Policies within the draft Shropshire Local Plan and the NPPF. It is also noted that draft Policy DP5 has been subject to Sustainability Appraisal and public consultation.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0487	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Not Specified	No	Not Specified	Under Policy DP27 residential developers are expected to provide broadband and mobile communication infrastructure (see HBF response to Policy DP27 below), the developer should not also be expected to ensure access to on-line services, which is beyond the control of a developer. This Bullet Point is inappropriate, Bullet Point 6b should be deleted from Policy SP6. Under Policy SP6 Bullet Point 10, major development proposals (more than 10 dwellings) must be accompanied by a proportionate Health Impact Assessment (HIA) detailing how they respond to contributors to health and well-being, including details of ongoing management or mitigation of issues where necessary. The NPPG confirms that a HIA can serve a useful purpose at planning application stage and consultation with the Director of Public Health as part of the process can establish whether a HIA would be a useful tool for understanding the potential impacts upon wellbeing that development proposals will have on existing health services and facilities (ID : 53-004-20140306). Any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. The requirement for HIA without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the NPPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to mitigate the impact.
A0487	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	Not Specified	No	No	As set out in the 2019 National Planning Policy Framework (NPPF), the Council is under a Duty to Co-operate with other Local Planning Authorities (LPA) and prescribed bodies on strategic matters that cross administrative boundaries (para 24). To maximise the effectiveness of plan-making and fully meet the legal requirements of the Duty to Co-operate, the Council's engagement should be constructive, active and on-going. This collaboration should identify the relevant strategic matters to be addressed (para 25). Effective and on-going joint working is integral to the production of a positively prepared and justified strategy (para 26). The Council should demonstrate such working by the preparation and maintenance of one or more Statements of Common Ground (SoCG) identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters. A SoCG should be made publicly available throughout the plan-making process to provide transparency (para 27). The National Planning Practice Guidance (NPPG) confirms that a key element of Local Plan Examination is ensuring that there is certainty through formal agreements that an effective strategy is in place to deal with strategic matters when Local Plans are adopted (ID : 61-010-20190315 & 61-031-20190315). The NPPG explains that a SoCG sets out where effective co-operation is and is not happening throughout the plan-making process (ID : 61-010-20190315). The NPPG also sets out that by the time of publication of a Draft Plan, a SoCG should be available on the Council's website. Once published, the Council should ensure that the SoCG continues to reflect the most up-to-date position of joint working (ID : 61-020- 20190315). The HBF note that there are no SoCGs accompanying the LPR pre-submission consultation. The Council has stated that a full SoCG will be made available ahead of submission of the LPR for examination (para 2.27). This is inconsistent with national policy. Shropshire adjoins twelve other LPAs namely Telford & Wrekin, Cheshire West, Chester, Cheshire East, Wrexham, Powys, Herefordshire, Malvern Hills, Wyre Forest, South Staffordshire, Stafford and Newcastle under Lyme. The HBF would expect the Council to prepare and maintain one or more SoCG with these LPAs. There is also a functional relationship with the Black Country authorities of Dudley, Sandwell, Walsall and Wolverhampton, where there is an identified unmet housing need of up to 29,000 dwellings. It is proposed that 1,500 dwellings included in Shropshire's housing requirement will support housing needs from the Black Country. There is correspondence dated 30th September 2019 from the Black Country authorities supporting the proposed strategic allocation at J3 M54 in the Shropshire Local Plan. These strategic matters should be set out in a SoCG.
A0487	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2, SP7 and SP10	Not Specified	No	Not Specified	The Council's overall HLS should provide some flexibility to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market. There is no numerical formula to determine the appropriate quantum for a contingency but greater numerical flexibility is necessary where HLS is dependent on a few large strategic sites or locations than in cases where HLS is more diversified. The HBF always suggests as large a contingency as possible (at least 20%). The Council's HLS surplus is only 130 dwellings (0.4%). This lack of headroom provides no flexibility. If during the LPR Examination, any of the Council's assumptions on lapse rates, windfall allowances and delivery rates are changed or any proposed housing site allocations are removed then any contingency is eradicated. The Council's windfall allowance comprises 8.67% of HLS, which should be justified by the Council. National policy only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply. It is noted that the Council has provided no site by site analysis of the deliverability of individual site allocations. The 2019 NPPF sets out that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and if appropriate to set out the anticipated rate of development for specific sites (para 73). Appendix 7 : Forecast of Delivery Timescales for Local Plan Allocations is not a housing trajectory. The omission of a detailed housing trajectory is inconsistent with the 2019 NPPF. A housing trajectory should be incorporated into the LPR. The Council has not provided a 5 YHLS Statement for the proposed housing requirement and trajectory. If the Council cannot demonstrate a 5 YHLS on adoption of the LPR and maintain a 5 YHLS throughout the plan period, then the LPR should not be found sound.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0487	B012	Policy SP6 Bullet Point 10 should be deleted.	Paragraph 6b asks developers to ensure access to high speed broadband networks it does not require them to provide a broadband service. No change proposed.	No
A0487	B013	In the absence of one or more published SoCG, it is difficult for the HBF and other interested parties to assess if the Council has satisfied the legal requirements of the Duty to Cooperate and the LPR is sound. The HBF may submit further comments in written Hearing Statements or orally during Examination Hearing Sessions.	With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs. It is considered appropriate to complete Statements of Common Ground with relevant Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.	No
A0487	B014	The Council's overall HLS should provide some flexibility to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market. The Council's HLS surplus is only 130 dwellings (0.4%). This lack of headroom provides no flexibility. The Council should consider the provision of a greater contingency. Appendix 7 : Forecast of Delivery Timescales for Local Plan Allocations is not a housing trajectory. The omission of a detailed housing trajectory is inconsistent with the 2019 NPPF. A housing trajectory should be incorporated into the LPR. The Council has not provided a 5 YHLS Statement for the proposed housing requirement and trajectory. If the Council cannot demonstrate a 5 YHLS on adoption of the LPR and maintain a 5 YHLS throughout the plan period, then the LPR should not be found sound. Further information on 5 YHLS should be provided by the Council.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers that it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. Assumptions regarding non-delivery rates, windfall allowances and delivery timescales for proposed allocations are considered appropriate and respond to consideration of the specific characteristics, constraints and opportunities that exist across Shropshire, in specific settlements and on specific sites. As specified within the explanation to draft Policy SP2, whilst it is acknowledged that there will inevitably be fluctuations over time, which may result in annual rates of delivery falling below or exceeding this level, it is expected that this will 'balance out' to ensure that the housing requirement is achieved. As such, it is considered that this expected rate of delivery over the Local Plan period of around 1,400 dwellings per annum forms the most robust trajectory of future housing delivery in Shropshire and will be used to assess annual housing delivery. This is considered a reasonable and precautionary approach to preparing a housing trajectory. This trajectory of future housing delivery will be kept up to date and a revised version published each financial year within Shropshire Council's Authority Monitoring Report (AMR).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0487	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3, DP1, DP3, DP11, DP12 & DP28	Not Specified	No	Not Specified	<p>The HBF response to the Council's draft Viability Study consultation raised concerns about numerous standard inputs and the cumulative impact of policy compliant requirements. A number of concerns have been addressed in the Council's final version of the Viability Study however the following concerns remain:-</p> <ul style="list-style-type: none"> <li>-Benchmark Land Values (BLV) of brownfield - Existing Use Value (EUV) of £500,000 per hectare (see Table 6.4) plus 20%, greenfield - EUV of £25,000 per hectare for agricultural land or £100,000 per hectare for paddock / amenity land (see Table 6.4) plus £400,000 per hectare and strategic sites EUV plus £300,000 per hectare (para 6.56). These premiums are low and may provide insufficient incentive to landowners. HCA Area Wide Viability Model (Annex 1 Transparent Viability Assumptions) dated August 2010 identified that "benchmarks and evidence from planning appeals tend to be in a range of 10% to 30% above EUV in urban areas. For greenfield land, benchmarks tend to be in a range of 10 to 20 times agricultural value". The Council's Viability Study acknowledges that this assumption has not been agreed with parties involved in the stakeholder consultation (para 6.58);</li> <li>-All abnormal costs (excluding an allowance of 5% for brownfield sites) are ignored. It is assumed that if residual land value excluding abnormal costs is greater than BLV, development is viable. If the residual land value including abnormal costs falls below BLV, development remains viable because such abnormal costs are deductible from BLV. If abnormal costs are high, then the premium uplift should be reduced and borne by the landowner rather than by a loss of planning gain however if the resultant figure provides insufficient incentive for a reasonable landowner to bring forward their land for development then the deliverability of the Local Plan is threatened. If the BLV is lower than the market value at which land will trade the delivery of housing targets will not be met. The NPPG specifically states (ID : 10-014-20190509) that BLV should "reflect the implications of abnormal costs" therefore abnormal costs should be recognised and acknowledged as forming an integral part of establishing BLV and a reasonable incentive for landowners to sell;</li> <li>-Assumed professional fees 8%. The Harman Report recommended 8% – 10% of all costs (unit build costs, external costs &amp; abnormal infrastructure costs &amp; policy compliant requirements) up to 20% for complex strategic sites ;</li> <li>-Contingencies assume 5% brownfield sites and 2.5% elsewhere. Assessment should not be conducted on the margins of viability. CIL Regulations were changed in 2019 and one critical change was that CIL and Local Plan Viability Assessment must use the same evidence base. In CIL viability assessment a buffer should be included to allow for changing economic circumstances. It is suggested that such a buffer should also be part of the Local Plan Viability Assessment to ensure that minor changes in economic circumstances do not necessitate a full-scale review of Local Plan policy requirements and viability assessment. The need for a substantial "cushion" is particularly important on greenfield sites, where as noted by the Harman Report, "prospective sellers are often making a once in a lifetime decision and are rarely distressed or forced sales".</li> <li>-Assumed sales costs of 3.5% but Harman Report recommends 3% - 5% ;</li> <li>-Assumed 1.5% for acquisition costs and legal fees but Harman Report recommends 1% - 2% for agent fee costs and 1% - 2% for legal fees ;</li> <li>-Policy DP1 Bullet Points 4 &amp; 5 (see detailed response). The additional costs for M4(2) and M4(3) compliant dwellings are assumed as £610 (£521 plus 17% inflationary increase) and £11,830 (£10,111 plus 17% inflationary increase). The Government's consultation "Raising Accessibility Standards for New Homes" (ending on 1st December 2020) estimates the additional cost per new dwelling is approximately £1,400 for dwellings, which would not already meet M4(2). In September 2014 during the Government's Housing Standards Review EC Harris estimated the cost impact of M4(3) per dwelling as £15,691 for apartments and £26,816 for houses. M4(3) compliant houses are also larger than NDSS (DCLG Housing Standards Review Illustrative Technical Standards Developed by the Working Groups August 2013) therefore larger sizes should be used when calculating additional build costs for M4(3) and any other input based on square meterage. The assessment also omits to consider the interplay between achievable density and proposed policy requirements on housing mix / unit sizes (NDSS &amp; M4(2)/(3));</li> </ul>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0487	B015	As identified in the Council's own Viability Study, there are significant viability challenges to the deliverability of development across the County. The HBF suggest that the Council's policy approach to Development Management Policies (SP3, DP1, DP3, DP11, DP12 & DP28) should be flexible.	Shropshire Council considers that the Whole Plan Viability Assessment undertaken to inform the draft Shropshire Local Plan is proportionate and robust. This assessment has been informed by and directly informed the draft Policies within the draft Shropshire Local Plan.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0487	B015 Cont'd						<p>☒ Policy DP1 Bullet Point 6 (see detailed response). The financial dynamics of older persons housing are different to general housing. Build costs are higher due to specific design criteria suited to the needs of older people, a greater gross to net floor area for non-saleable shared facilities, elongated construction / sales periods and cashflows as no individual units can be occupied until communal areas are completed, which means substantial upfront investment before any return on capital is received. It is noted that sheltered and extra care housing schemes have not been tested. Such schemes will be subject to viability assessment at planning application stage (para 4.78) ;</p> <p>☒ Policy DP12 (see detailed response). There are significant additional costs associated with biodiversity gain. The DEFRA Biodiversity Net Gain &amp; Local Nature Recovery Strategies: Impact Assessment Table 14 : Net Gain Delivery Costs (Residential) sets out regional costs (based on 2017 prices) in West Midlands of £18,527 per hectare of development based on a central estimate but there are significant increases in costs to £63,725 per hectare for off-site delivery under Scenario C. The Council's assessment tests £21,000 per hectare. There may also be an impact on gross / net site acreage ratio, which is not considered. The Government is committed to continued engagement with the housebuilding industry to address concerns and risks. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that net gain does not prevent, delay or reduce housing delivery ;</p> <p>☒ Policy SP3 Bullet Point 2a &amp; Policy DP11 Bullet Points 1a – 1d The Council's updated viability assessment should include additional costs for the Future Homes Standard. The Government's estimated cost for Option 2 (interim step of 31% reduction in carbon emissions compared to the current Part L 2013 requirements) is £4,847 per dwelling ;</p> <p>☒ Policy SP3 Bullet Point 1f &amp; Policy DP28 Bullet Point 3d. The Department for Transport - Electric Vehicle Charging in Residential &amp; Non-Residential Buildings consultation estimated an installation cost of approximately £976 per EVCP plus any costs for upgrading local electricity networks, which under the Government's proposal automatically levies a capped figure of £3,600 on developers therefore this figure should also be included in the Council's viability assessment. The supply from the power grid is already constrained in many areas across the country. The HBF and its Members have serious concerns about the capacity of the existing electrical network in the UK. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard. These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. The Council's assessment excludes any costs for upgrading the local network.</p> <p>Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on the viability of development.</p> <p>After sensitivity testing, the Viability Study concludes that :- ☒ within the South area, it is recommended that the Council only includes larger and medium sized greenfield sites if there is a confirmation from the landowner or site promoters that a policy compliant scheme can be delivered. Alternatively, the Council could seek more smaller sites (below 50 units) and substitute these for the larger sites (paras 12.92 &amp; 12.93); ☒ in the North area, the Council should be cautious about relying on development (para 12.97) ; and ☒ no firm conclusions are drawn about the strategic sites around Shrewsbury because the Council is still working up the assessment of the strategic infrastructure and mitigation requirements. It is recommended that that the Council continues to engage with developers / landowners (paras 12.78 – 12.80).</p>
A0488	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>The Hierarchy of Settlements is flawed due to the wording of Para 5.41 which relaxes the full requirement for Hubs to have both "significant employment" and "peak time public transport". That is contrary to the Council's adopted Climate Change Emergency policies and the proposed SP3 Climate Change and Sustainability Objectives SO5, SO6, &amp; SO12 in the Draft Plan which seek to minimise car travel and maximise trips by sustainable travel, and to reduce carbon emissions. The Hub Threshold score 48points was set using flawed and inaccurate scoring in the original 2017 Table 10, but has been kept</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0487	B015 Cont'd			No
A0488	B001	<p>The Hierarchy of Settlements must be amended. It must correspond with and supports the Spatial Vision, SP1 Shropshire Test, SP3 Climate Change and Sustainability Objectives SO5, SO6, &amp; SO12 which seek to minimise car travel and maximise trips by sustainable travel, and to reduce carbon emissions. In Para 5.41 the relaxation wording must be removed :</p> <p>Remove "In circumstances where there is no regular public transport service; and/or high speed broadband; and/or multiple significant employment opportunities, a larger range of services and facilities would be necessary to compensate to enable a settlement to achieve the specified point's threshold."</p> <p>The full Hub criteria set out in Para 1.16 Table 2 and Para 5.35 Table 6 must be used to determine Settlement status by objective assessment. Critically the requirement to have both "significant employment opportunities" and "peak time public transport" for Hub status must be met.</p> <p>2) The list of Settlements must then be reviewed to confirm compliance with the full Hub criteria, and;</p> <p>3) The Draft Plan settlement development status &amp; allocations amended accordingly.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen.</p> <p>Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.</p> <p>As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0488	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Trefonen	Not Specified	No	Not Specified	Trefonen does not have any “significant employment opportunities” or “peak time public transport”. It is the only proposed Hub settlement with neither of these key requirements, and allocating it as such would be contrary to SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12.
A0489	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0489	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0489	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from ‘inappropriate development’. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is ‘inappropriate development’, unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating ‘very special circumstances’. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0489	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0488	B002	<p>Trefonen should be removed from the Community Hub settlements in Policy S14.2 Community Hubs – Oswestry Place Plan Area and Schedule SP2.2: Community Hubs. It should be a Rural Settlement.</p> <p>We believe that sufficient housing to meet the needs of local people over the Plan period can be met by “Affordable Exception” and “Rural Exception” Housing policies set out in the Draft Plan for rural settlements with a school, including the type &amp; size of housing that is identified to be required (starter, intermediate, downsize, accessible - houses or bungalow).</p> <p>Any development should conform to the Village Design Statement.</p> <p>Reference to compliance with VDS should be added into SP5 High Quality Design</p>	<p>Shropshire Council undertook a robust assessment during the Hierarchy of Settlement process and Trefonen's services and facilities meant that its score resulted in it being a Hub. Notably there are no housing allocations in the settlement as part of this Plan Review. A minor modification is proposed to reduce the gross housing requirement for the village over the plan period (see response to A0605)</p> <p>Community Led Plans are considered to be appropriately referenced within the proposed explanation of draft Policy SP5 and other draft policies/proposed explanations to draft policies. Village Design Statements are considered a form of community-led plan. However, for clarity a minor modification is proposed to the explanation to draft Policy SP5.</p>	Yes
A0489	B001	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. Draft Policy SP1 is a ‘gateway’ policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0489	B002	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0489	B003	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself.</p> <p>The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable.</p> <p>The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page.</p> <p>Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.</p>	No
A0489	B004	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market.</p> <p>Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0489	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0490	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	No	Not Specified	Not always feasible to deliver specialist housing for older persons on schemes of over 50 units. Extra care or retirement housing (esp. those with care elements) can generally only be delivered in volume and operators tend to deliver such accommodation as bespoke schemes in their own right. This policy objective might be possible on sites exceeding 200+ units but on smaller schemes such an obligation is likely to render many schemes undeliverable if compelled to deliver this type of accommodation due. Providing lifetime homes or accessible/adaptable dwellings is quite a different objective.
A0490	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2	Not Specified	Not Specified	Not Specified	The guideline of around 125 dwellings for Ruyton XI Towns and around 155 dwellings for Weston Rhyn could be construed by some as being a maximum. The policy should make it clear that these figures are not meant to be seen as a “cap” but instead be expressed as a minimum.
A0490	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Ruyton XI Towns RUY019	Not Specified	Not Specified	Not Specified	The policy wishes for any redevelopment of the site to consider the potential for interpretation of heritage features on the site and also the contribution it might make to the wider heritage features elsewhere in the settlement (e.g. Ruyton Castle Scheduled Monument), but there are no known features on the site (our Archaeological Desktop that supported the Outline PP ref. 10/04143/OUT) demonstrates this and to associate this site with the Castle remains SAM located way beyond the site demise to the east of the village (as depicted on the Place Plan extract below) is unreasonable.
A0491	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	Not Specified	Not Specified	Not always feasible to deliver specialist housing for older persons on schemes of over 50 units. Extra care or retirement housing (esp. those with care elements) can generally only be delivered in volume and operators tend to deliver such accommodation as bespoke schemes in their own right. This policy objective might be possible on sites exceeding 200+ units but on smaller schemes such an obligation is likely to render many schemes undeliverable if compelled to deliver this type of accommodation due. Providing lifetime homes or accessible/adaptable dwellings is quite a different objective.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0489	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0490	B001	The Council accept a need to deliver specialist (care) housing but fail to make provision in their draft allocations. A separate policy to deliver specialist housing is considered necessary as NPPF Para 61 guides and NPPG recommends (ID63).	Noted. Draft Policy DP1 ensures that provision of an appropriate range of specialist housing designed to meet the diverse needs of older people is included within all sites of 50 or more dwellings, this includes proposed allocations. As it is recognised that sites of 50 or more dwellings will be diverse in nature, the specific type/quantity of these properties is not specified, this provides appropriate flexibility to respond to site specific/location specific factors. It is also considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically: -Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings. -Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people. -Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation.	No
A0490	B002	The guideline of around 125 dwellings for Ruyton XI Towns and around 155 dwellings for Weston Rhyn could be construed by some as being a maximum. The policy should make it clear that these figures are not meant to be seen as a "cap" but instead be expressed as a minimum.	The figures for these settlements are meant as a guideline, and so this is not meant to be read as either a minimum or maximum figure.	No
A0490	B003	Due to costs, the only incentive to consider this opportunity further is if the allocation (maps included as part of rep) was extended to include the small paddock to the west which might enable any renewable energy scheme to be brought forward on the field to the west of the paddock. The site can sustain 80 houses, rather than 65 in the guideline	The figure of 65 for the site is only a guideline and so appropriate housing numbers around this figure would be considered at the planning application stage. The site as preferred is considered appropriate in terms of size and scale. Likewise the additional land to the west was not promoted at any stage until now	No
A0491	B001	The Council accept a need to deliver specialist (care) housing but fail to make provision in their draft allocations. A separate policy to deliver specialist housing is considered necessary as NPPF Para 61 guides and NPPG recommends (ID63).	Noted. Draft Policy DP1 ensures that provision of an appropriate range of specialist housing designed to meet the diverse needs of older people is included within all sites of 50 or more dwellings, this includes proposed allocations. As it is recognised that sites of 50 or more dwellings will be diverse in nature, the specific type/quantity of these properties is not specified, this provides appropriate flexibility to respond to site specific/location specific factors. It is also considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically: -Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings. -Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people. -Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0491	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	Not Specified	Not Specified	Not Specified	This policy does not provide for the redevelopment of brownfield sites and must make provision for this. NPPF consistently guides development towards brownfield land (e.g. Paras 117 and 118) yet this has been ignored here.
A0491	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2	Not Specified	Not Specified	Not Specified	The guideline of around 125 dwellings for Ruyton XI Towns and around 155 dwellings for Weston Rhyn could be construed by some as being a maximum. The policy should make it clear that these figures are not meant to be seen as a "cap" but instead be expressed as a minimum. WRN016 in the maps does not show the full extent of the site which has been granted.
A0492	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and SP3	Yes	No	Yes	<p>Object to the way in which the housing growth numbers in the Local Plan have been considered in relation to the Climate Change requirements of the Plan and the Sustainability Appraisal document, and the declaration of a Climate Emergency by Shropshire Council in 2019.</p> <p>I do not object to the need for new housing growth in Shropshire, but when faced with a climate crisis I cannot understand why the Council is promoting a plan which recommends housing growth some 5000 dwellings above that which is defined as needed under the National Housing Methodology. (A Council "requirement" of 30,800 against defined need of 25,894).</p> <p>There are many good statements in the Plan and supporting documents referring to climate change and the need for it to be tackled, and this is welcomed. However, when these statements are tested against the ambitious housing growth figures that are proposed, they are found wanting. For example, the Reg 19 Introduction refers to seeking "to safeguard the environment, and enable adaptation to climate change"; S5 of the Housing Strategy document refers to "minimising the environmental impact of...future housing development in the interests of climate change"; and the 5 key objectives of the Overall Housing Strategy include reference to "minimising environmental impact".</p> <p>However the implementation of these aims and policies is undermined by the ways in which the Plan has failed to properly account for the impact of the proposed new housing. For example, under para. 3.40 in the section on Climate Change (SP3) there is a requirement, quite properly, for all planning applications for new development to set out how they comply with Policy SP5 relating to design – but there is no similar requirement to show how new housing policies should comply with Climate Change policy SP3. This is a major failing of the Plan, which is further evidenced in the Sustainability Appraisal document in which the different levels of housing growth are considered against the 16 Sustainability Objectives; in particular SO12 (reducing CO2 emissions) and SO13 (Adapting and mitigating climate change).</p> <p>The conclusion must be that the draft Plan has failed to address the impact of its housing growth figures on the CO2 and Climate Change policies and statements in the very same Plan. Including worthy policies and declaring a Climate Emergency becomes meaningless in these circumstances. Given the gravity, enormity and speed with which the climate crisis is facing us all, the Council must re-examine the scale of its proposed housing development and justify how such a scale is compatible with its policies and objectives on climate and the environment.</p>
A0493	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	<p>Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ.</p> <p>It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored.</p> <p>A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0491	B002	This policy does not provide for the redevelopment of brownfield sites and must make provision for this. NPPF consistently guides development towards brownfield land (e.g. Paras 117 and 118) yet this has been ignored here.	Noted. Shropshire Council considers draft Policy SP9 gives appropriate consideration to brownfield land. Specifically they types of sites upon which it is proposed that residential development can occur include "conversion of existing buildings within or immediately adjoining the built form of the settlement"; and "suitable small-scale infill sites of 0.1ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings"; and "By affordable exception sites, cross-subsidy exception sites and entry level exception sites meeting evidenced need and the other requirements of Local Plan Policies." Each of these categories can of course include appropriate brownfield land. Furthermore employment development which is of a type and scale appropriate to the settlement and other non-residential development that benefits the rural community by providing required community facilities and infrastructure will be supported where it can be achieved through the reuse of existing buildings or on suitable sites within or immediately adjoining the built form of the settlement and meets other requirements of Local Plan Policy. Again, this includes appropriate brownfield land. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP18 specifically addresses the re-use of previously developed (brownfield) land and stipulates the circumstances within which such development will be supported.	No
A0491	B003	The SAMDev allocation WRN016 should reflect the extent of the permission which reflects the brownfield extent of the site and as such the Local Plan should identify this and allocate it accordingly. Additionally, whilst the site lies upon the Councils Brownfield Land Register under the same WRN016 reference this too fails to reflect the "actual" extent of the previously developed site. These errors must be rectified and the settlement boundary must be extended to include the site as shown on the plan below which reflects the established brownfield extent of the site.	The figures illustrated for the sites are only guidelines and so appropriate housing numbers around the figures would be considered at the planning application stage. The site outlined in brown indicates the land which was adopted as a SAMDev site. Any subsequent additions to this would be from a planning application only, as only the land indicated was adopted as part of SAMDev and so this will not change.	No
A0492	B001	The Council needs to fundamentally reconsider the relationship and compatibility between the proposed housing growth figures and the impact of such growth on CO2 emissions and the threat of Climate Change. This will require a re-examination of the relationship between SP2 and SP3, and a re-examination of the Sustainability Appraisal in order to produce an accurate statement of the impact of housing growth on SP3, and its impact on the Sustainability Objectives relating to CO2 production and Climate Change (SO12 and SO13)	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. The Sustainability Appraisal process undertaken to inform the draft Shropshire Local Plan, which includes consideration of Draft Policy SP2, is considered appropriate, robust and legally compliant.	No
A0493	B001	Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored. Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.	Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0493	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030).</p> <p>At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers ‘.. will make provision for the needs of the town and surrounding hinterland...’?</p> <p>In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?</p>
A0493	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	<p>The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p> <p>The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the “sustainable urban extension” stated in the Local Plan.</p>
A0493	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth.</p> <p>However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0493	B002	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0493	B003	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0493	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0493	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site.</p> <p>Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each another regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18.</p> <p>It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated?</p> <p>BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.</p>
A0493	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan.</p> <p>Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment.</p> <p>Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458.</p> <p>Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network.</p> <p>The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.</p>
A0493	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference?</p> <p>Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters?</p> <p>Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?</p>
A0493	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	<p>Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published?</p> <p>Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated.</p> <p>There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth?</p> <p>BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0493	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0493	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0493	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0493	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat.</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0494	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Longden	No	No	No	<p>Do not consider the Draft Shropshire Local Plan sound or sustainable - see previous Regulation 18 representations.</p> <p>In particular, consider the points system/methodology used within the Hierarchy of Settlements is totally unsound and do not agree with its application in Longden - as explained in detail by the letter from LVAG. Thought Community Hub status would be identified by services and facilities, including employment opportunities and believe Longden does not provide them. It has a small primary school and nursery; no secondary school; pub only open 3 days a week; village shop and post office are combined, costly, have limited stock and are very small; no permanent library (mobile once a fortnight for 10 mins only); no doctors surgery; no superfast broadband; sports facilities are limited to two tennis courts and a football field adjacent to a small children's playground; few employment opportunities (resulting in significant commuting to Shrewsbury and beyond); no cycle lanes or potential for them due to narrow roads; and a limited bus service (regular but it is not sufficiently frequent to have a major impact on sustainability - it is impossible to connect with either trains or other buses out of Shrewsbury town centre to reach other destinations at a reasonable time in the morning or returning in the evening and the service does not go direct to Pontesbury, Bayston Hill or Dorrington where catchment GPs are located). This cannot be compared to other settlements like Pontesbury and Minsterley which achieve similar scores. This increases reliance on private vehicles.</p> <p>Longden is a very small and ancient village with mature trees and hedgerows, that is only a fraction of the size of all the other villages in the area. It has limited road infrastructure (in places roads are narrow and single width, it is difficult for two large vehicles to pass, and there is no pavement) that reflects the size of the current community. The main road to Shrewsbury is unclassified. Connections to the A49 and A5 require travel on narrow, often single-track lanes, where large vehicles cannot pass.</p> <p>In 2018 a community survey was undertaken and concluded the community wished to remain a Community Cluster and was opposed to becoming a Community Hub. Distressed local views are being ignored.</p> <p>Development in Longden and Community Hub status for the village will have a negative impact on the climate, significantly increase carbon emissions and congestion. It could also destroy the village's ethos and result in loss of hedgerows (replacements take years to mature). Arrow Court is one such example - blot on the landscape; construction caused noise, dust, etc disturbances; road too narrow and gardens paved for parking.</p> <p>Community Cluster status would enable Longden to experience some growth through infill (in addition to the significant growth experienced in recent years) whilst minimising carbon emissions, although even this should be carefully looked at to protect the village ethos.</p> <p>If we are to meet Climate Change targets, limitations in infrastructure needs to be addressed before significant numbers of housing are built.</p> <p>Feel strongly about and distressed by proposals to designate Longden a Community Hub, as building could be anywhere in the village.</p> <p>Supported Right Home, Right Place surveys which indicated a need for 18 homes, this has been ignored as it did not provide anticipated need.</p> <p>Furthermore I do not understand why some proposed development sites are included when they have been subject to appeals and previously rejected. In particular, sites 016 and 002.</p>
A0495	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	Not Specified	No	Not Specified	<p>Support the aim of draft Policy SP15 and fully endorse the benefits of a Council endorsed Whole Estate Plan for the future of those living and working within the rural areas of Shropshire.</p> <p>However, concerned about the requirement for public consultation. Specifically, very much support the need for public consultation, without which the degree of weight that can be applied to a Whole Estate Plan is limited, however neither draft Policy SP15 or its Explanation is provided on what this means, so it is open to interpretation.</p> <p>Consider the level of public consultation should be reasonable and proportionate to the relevant Whole Estate Plan, recognising that the scope, detail and nature of the strategy varies between them.</p> <p>Consider that whilst consultation with the residents of the land owned by the Estate is reasonable, it is not considered wider public consultation would be reasonable or appropriate.</p>
A0496	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	No	Not Specified	<p>The National Planning Policy Framework (NPPF) is clear there is a need to consider brownfield land for residential development and that where unallocated sites for particular uses are not likely to come forward, they should be considered for alternative uses.</p> <p>Specifically para 118(d) which relates to how planning policies and decisions should promote and support development of under-utilised land and buildings, especially if this helps to meet identified housing needs where land supply is constrained and available sites can be used more effectively. Para 121 advises that Local Authorities should take a positive approach to applications for alternative uses of unallocated developed land, where it would help meet identified needs. In particular use of retail and employment land for homes in areas of high demand, provided these does not undermine key economic sectors or sites/town centre viability and is compatible with the NPPF and making more effective use of sites providing community services, where it also maintains/improves the quality of these services and access to open space.</p> <p>To ensure consistency with the NPPF, consider the draft Shropshire Local Plan should be more flexible to allow for circumstances whereby residential development outside of development boundaries (and outside of Green Belt) on brownfield land can be supported, particularly where an existing use on the site can no longer be sustained.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0494	B001	Refers to correspondence from LVAG. Remove Community Hub status from Longden Village.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>The proposed development strategy for Longden is also considered appropriate, effective, sustainable and deliverable. It recognises the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities and as such the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019).</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. The Consultation Statement for the draft Shropshire Local Plan includes appendices summarising previous stages of consultation.</p>	No
A0495	B001	<p>Criterion c) of draft Policy DP15 should be amended as follows: c) it has been subject to an appropriate level of public consultation, to be agreed with the Local Planning Authority.</p> <p>The explanation of draft Policy DP15 should also be updated to reflect this change, to state: With regard to public consultation, it is recognised that not all plans will contain equivalent levels of detail and may focus upon different aspects of setting out and delivering their long-term vision. As such, the nature and scope of any public consultation should be tailored to reflect the nature of the Whole Estate Plan. This should be agreed with the Local Planning Authority prior to the consultation taking place.</p>	<p>Noted. Shropshire Council considers that it is appropriate to require Whole Estate Plans to be endorsed by Shropshire Council and used as a material planning consideration to have been subject to meaningful public consultation. Meaningful public consultation will depend on the nature, scope and context of the Whole Estate Plan.</p>	No
A0496	B001	<p>Para 4 of draft Policy SP7, relating to circumstances where market housing can occur outside development boundaries, should be amended to include sites that meet the following: brownfield land, outside the Green Belt and no longer viable for its current use.</p>	<p>Noted. Shropshire Council considers that the existing criteria within para 4 of draft Policy SP7 are appropriate.</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy DP18 specifically addresses the re-use of previously developed (brownfield) land and stipulates the circumstances within which such development will be supported.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0497	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Schedule S3.1(i) BRD030	Not Specified	No	Not Specified	<p>Object to the development strategy for Bridgnorth which is not justified or effective as the evidence base does not support the strategy to allocate BRD030 (Tasley Garden Village) taking into account the reasonable alternative at BRD032 (Stanmore Garden Village). Response to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of this Representation which includes an initial Masterplan for Stanmore Garden Village, a number of technical studies undertaken in relation to Stanmore Garden Village, and work comparing Stanmore Garden Village and Tasley Garden Village and critiquing Tasley Garden Village) remains relevant.</p> <p>Stanmore Garden Village presents an opportunity to deliver a new, genuine garden community. The proposal has been adapted to take account of local views, incorporate great design with zero net carbon objectives, affordability (around 30% of provision would be affordable), significant amounts of green space, long term stewardship and services and facilities wanted by the community delivered early in the development. It will also lead to enhancement of Stanmore Country Park. It is the only genuinely deliverable site for Bridgnorth and will contribute to meeting the environmental targets of the County.</p> <p>Consider Tasley Garden Village is neither suitable, deliverable (including viable) nor available and on this basis this proposed allocation is unsound. Tasley Garden Village has risks associated with land acquisition, accessibility, livestock markets (health and wellbeing), highways, welfare and community facilities, impact on carbon emissions, there are questions over appropriateness of the land allocated for employment uses and commercially the cost of mitigating these will be substantial and may not be viable. The site will not achieve the principles of a garden village.</p> <p>By way of context:</p> <ul style="list-style-type: none"> <li>- The SAMDev Plan Inspector noted Green Belt constrained development in east Shropshire, including to the east of Bridgnorth (and also noted limited development opportunities outside Green Belt at Bridgnorth) and recommended a modification to the SAMDev Plan (subsequently included) committing to a detailed Green Belt Review.</li> <li>-Stanmore Garden Village was initially supported by Shropshire Council and identified as a preferred allocation within the Preferred Sites consultation.</li> <li>-Technical studies, stakeholder engagement and consultation have informed the refinement of proposals at Stanmore Garde Village.</li> <li>-The Council changed its position in April 2020 and sought to support an alternative site, Tasley Garden Village. The Council could have pursued this location from the outset of the Local Plan Review, but had indicated a preference for development at Stanmore due to consideration of opportunities and constraints.</li> </ul> <p>Shropshire needs more housing (particularly affordable housing for younger people) and employment opportunities (modern facilities) are required to retain and draw in employers. Without this economic decline could occur as the economically active leave to find jobs and businesses are attracted to locations outside Shropshire with modern facilities and better communications, choice and lifestyle. Bridgnorth is a rare opportunity to retain major regional employers, working with them to expand and develop a hub of new technology industries in modern buildings. Employment opportunities in the area are dominated by Telford (regionally) and Stanmore Business Park (locally). Stanmore Garden Village benefits from sustainable/better access to these locations and its adjacency to Stanmore Business Park provides opportunities for clustering to form a business hub/new quarter of the town (an approach supported by Shropshire Council's evidence base including the employment land review and economic development needs assessment). Tasley Garden Village is in the wrong location with poorer access to key employment locations and given its location, it is considered employment provision proposed on the site is not attractive to the market as it is on a secondary route with limited transport links nor is it viable/deliverable (supported by views of a local commercial property agent) - no evidence has been provided on viability/deliverability.</p> <p>Consider there is a strong planning case to justify development of Stanmore Garden Village and inclusion of the site in the draft Shropshire Local Plan. This includes that exceptional circumstances in relation to removal of the site from the Green Belt exist for such development (clear the Council felt this was the case when the site was originally identified, reinforced by the Council's proposal to release Green Belt for employment land at Stanmore, the wider release would consolidate this to deliver sustainable development). Whilst Tasley Garden Village is outside the Green Belt as it is not considered suitable, deliverable (including viable) or available it is unsound.</p> <p>Stanmore Garden Village is available immediately, being predominantly owned by two landowners that intend to deliver the proposals themselves. There is no need for/risk associated with negotiation or acquisition. It represents an opportunity to deliver housing and employment. Tasley Garden Village however is in multiple ownerships (none owned by the proposed developer), requiring formal options/equalisation agreements. This will impact on viability, reducing development contributions (including affordable housing)/amenity provision or lead to higher house prices. Later phases could be cancelled if sufficient profit is not achieved. This creates risk about delivery (housing and facilities). Comparable schemes to Tasley Garden Village highlight this risk: Langley Sustainable Urban Extension (SUE), Birmingham, is an allocation with multiple ownerships that has experienced significant delays to delivery; whilst a proposed 'Garden Community' at Easton Park within the Uttlesford Local Plan, led to an Inspector advising the withdrawal of the Local Plan (which occurred) due to concerns including uncertainty about deliverability of employment and infrastructure. Promoters of Tasley Garden Village have provided no evidence of control of land, viability or deliverability. Examination of the North Essex Joint Local Plan demonstrates importance of viability, as two proposed Garden Communities were removed during examination to make the plan 'sound'.</p>
A0497	B001 Cont'd						<p>Tasley Garden Village wraps around the site for the proposed relocation of the livestock market. Given associated noise/odour, livestock markets and housing do not mix, hence the need for its relocation. This proximity raises concerns about commercial viability/deliverability for both housing and continued operation of the livestock market which is key to the local economy.</p> <p>Poultry units proposed within the wider Tasley Garden Village are a similar constraint. The proposed site guideline to require this operation to cease prior to occupation of housing and any future S106 legal agreement/Grampian Condition would not work to control this matter.</p> <p>Shropshire Council has declared a climate emergency. A principal contributing factor easily influenced by the location of development is travel by car, with most journeys to work or a shop. Allocation of Stanmore Garden Village rather than Tasley Garden Village would make a significant contribution to reducing travel to work by car as it is closer to local and sub-regional employment (estimate Tasley Garden Village would result in an extra 2 million miles of commuting a year, based on traffic flows within the Tasley Garden Village site promoters assessment); increases the ability to walk/cycle to work; and reduces congestion. This will also increase health and wellbeing.</p> <p>Green Belt is a policy tool, the Green Belt associated with Bridgnorth is related to stopping the unrestricted sprawl of the West Midlands Conurbation (12 miles from Bridgnorth), but should not suppress the economies and meeting needs of towns around it. Stanmore Garden Village is located in the Green Belt, but it is the best location to: support economic growth (a key aspiration of the draft Shropshire Local Plan) due to proximity to Stanmore Business Park and sub-regional employment opportunities; support expansion of existing businesses; provide opportunities for balanced housing and employment provision; and meet long term growth needs, by opening up a new quarter for the town. This would be seen as the success of Bridgnorth and not West Midland encroachment (nearly 10 miles of Green Belt would remain between the two).</p> <p>Green Belt is not related to landscape quality. Landscape at Stanmore Garden Village is gently rolling lowland agricultural farmland screened by landform, woodland and field boundary vegetation, with a back-drop of the former RAF base. Tasley Garden Village however is far more expansive, being in a larger valley where the impact of development would change the nature of the valley to a greater degree; it can be seen from the Shropshire Hills Area of Outstanding Natural Beauty (AONB) and is outstandingly beautiful.</p> <p>Majority of the local community, local members and Town/Parish Council's (those who know the area best) want development to be located where it will cause the least damage, requires less mitigation, does not compound environmental issues/destroy the landscape and is viable/deliverable, and addresses housing challenges/improves the environment, Stanmore.</p> <p>A brief for work to evaluate the transport performance of the Tasley Garden Village and Stanmore Garden Village is not fit for purpose to evaluate and rank the two proposals. A Review (Appendix 4 of this representation) concludes that to avoid subsequent challenge and to withstand scrutiny at Local Plan Inquiry on soundness, it must be refashioned and extended with purpose, objectives and means to identify the appropriate outcome for the Community (people, places, activity) in the context of adopted and emerging policy clearly stated.</p> <p>Comments on the Development Options Assessment are also relevant.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0497	B001	BRD030 should be deleted and Stanmore Garden Village (BRD032) (part) should be allocated for 70ha comprising 850 dwellings, 16ha employment land, new local centre and green space.	<p>Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken, which included consideration of an appropriate range of factors used to identify constraints and opportunities.</p>	No
A0497	B001 Cont'd			

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0497	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Schedule S3.1(i) BRD030	Not Specified	No	Not Specified	<p>With regard to the Development Options Assessment undertaken for Bridgnorth:</p> <p>-Stanmore Garden Village benefits from direct access onto an A road, however the residential element of the Tasley Garden Village has no direct access to the A458 and access would have to be provided by a minor B road, entirely inappropriate for this scale of development. Furthermore Stanmore Garden Village is informed by a high-level highways appraisal which concludes appropriate mitigation of any impact on the highway network can be managed. Promoters of Tasley Garden Village have not given detailed consideration to highway impact of the development, particularly into Bridgnorth town centre (where there will be an increase in vehicle movements) where there is very limited capacity to undertake improvements physically within the town, due to proximity of buildings; and from a land availability point of view, as the extent of the adopted highway is very limited. Stanmore Garden Village and Tasley Garden Village are similar distances from Bridgnorth town centre, however connectivity must be considered. Stanmore Garden Village has been designed to promote sustainable modes of travel including adopting a design which promotes sustainable modes of travel; providing pedestrian and cycle links across Hermitage Ridge; providing public transport links (Appendix 6 of this representation summarises discussions with local bus operators); reducing dependence on private vehicles; and providing a Local Centre at an early stage of development, incorporating a 'park and choose' bus facility. Consider there are significant connectivity issues between Tasley Garden Village and Bridgnorth, as there is a lack of available land (in the control of the promoter) fronting onto A458, so pedestrian or cycle routes would require a significant diversion away from desire lines and result in potentially considerable connectivity challenges. There are also significant concerns about feasibility of creating a pedestrian footbridge over the A458, which is not possible along desire lines, without third party land which have declined to make it available. As such pedestrians and cyclists will be forced to use unsafe routes at grade over A458, which will be a major constraint to the development.</p> <p>-Stanmore Garden Village includes enhancement to the significance of the Scheduled Monument at The Hermitage, which is at risk from decay. Proposals can deliver improvements in terms of management, access, interpretation and in the circumstances of ongoing decay can provide a record of the past on location. As such it would represent a positive strategy for the conservation and enjoyment of the historic environment providing wider social and cultural benefits (consistent with paras 185 and 200 of the National Planning Policy Framework (NPPF)). The assessment of development options gives no weight to the benefits the Stanmore proposal can bring and provides no evidence to show the benefits have been considered favourably. Historic England comments within the Masterplan are erroneous and have been superseded. It is concluded, with the favourable consideration of the proposed enhancement of The Hermitage, together with mitigation through masterplanning, Stanmore represents less risk to heritage assets than Tasley Garden Village. Furthermore, as The Hermitage is beyond the developed edge of Stanmore Garden Village, it is a logical and appropriate location for amenity space. Conversely, the Grade II listed Leasows Farm and The Leasows at Tasley Garden Village are located where mitigation leads to dissecting the site, making it difficult to provide a cohesive settlement in placemaking terms.</p> <p>-Consider that whilst both sites need assessment, Tasley Garden Village is more sensitive from an ecological perspective.</p> <p>-With regard to landscape, the assessment states that a very small part of the site falls within the medium-high landscape and visual sensitivity to housing and high landscape and visual sensitivity to employment, it is unclear which area this is referencing. Consider Tasley Garden Village, given the nature of the site, would have a far greater impact in terms of Landscape and Visual Impact than Stanmore Garden Village.</p> <p>-Consider the agricultural land quality of Stanmore Garden Village is either grade 3a or 3b, whilst it is grade 2 for Tasley Garden Village (based on sampling of land next to the garden village). Furthermore can confirm the viability of the remaining holding if Stanmore Garden Village is developed.</p> <p>-Stanmore Garden Village is sequentially preferred in regard to flood risk, given it is entirely located within flood zone 1 and vulnerability to other sources of flooding is low, whilst Tasley is primarily located in flood zone 1, but also has areas of flood zone 2 and 3 (high risk of flooding) and also has small areas in the 1 in 30, 1 in 100 and 1 in 1,000 year surface flood risk zones.</p> <p>-With the exception of preferred allocation (P58a) Stanmore Garden Village is located outside source protection zones, as is Tasley Garden Village.</p> <p>-Stanmore Garden Village is close to sources of noise from road and commercial development. However, Tasley Garden Village is also close to sources of noise from road (a more heavily trafficked road); commercial development (this will include a relocated livestock market. Noise and odour from the livestock market will not be mitigated by trees a necessary buffer will take out a good proportion of the site and if used as Green Infrastructure, user experience will be compromised); and also adjoins an operational quarry and a further site consent for mineral extraction.</p> <p>-Stanmore Garden Village offers potential to enhance the sustainability of the existing cluster of development at Stanmore and The Hobbins. Employment provision at Tasley Garden Village is not attractive to businesses (SAMDev allocation ELR011/a of 6.7ha will provide sufficient quantity to satisfy demand for the LPR period to 2038).</p> <p>-Public consultation has resulted in Bridgnorth Town Council objecting to Tasley Garden Village and supporting Stanmore Garden Village.</p>
A0497	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Schedule S3.1(ii) P58a and STC002	Not Specified	No	Not Specified	<p>Employment allocations (P58a and STC002) are supported as necessary extensions of Stanmore Business Park (formerly Stanmore Industrial Estate). However, amendments to their proposed site guidelines to remove use class B1, presumably to reflect changes to the Use Classes Order, mean it is unsound. Consider the proposed site guidelines should be amended to add new business use class E(g)(i) offices, (ii) research and development, and (iii) light industrial that superseded B1, as these are essential uses to allow the site to reach its potential and provides flexibility to ensure best chance of delivery and allow for market changes. Furthermore, each of these uses are already represented on Stanmore Business Park (existing uses are E (g), B2, B8 and Sui Generis). The E (g) uses are complementary of engineering and the advanced manufacturing businesses on site. Therefore whilst the proposed employment allocations P58a and STC002 will be focused towards the engineering and advanced manufacturing sectors, there needs to be the opportunity to complement these and allow the existing employment base in all use classes to grow and respond to market changes.</p> <p>The Shropshire Interim Economic Development Needs Assessment (EDNA) predicts structural changes to the employment sector over the plan period, with growth and decline in job sectors in Shropshire that in all scenarios forecast a workforce change with growth in office and light industrial class E (g), a fall in B2 and a near neutral position in B8. This is however Shropshire wide. Therefore, to allow for market changes and give employment land at Stanmore best chance of delivery over the plan period, use classes should be kept as broad as possible. There may also be long-term shifts in working patterns as a result of the Covid-19 that are not yet evident, a flexible and responsive policy is therefore the best option to ensure delivery.</p> <p>The policy should also be amended to reference Stanmore Business Park, rather than Stanmore Industrial Estate (renamed in 2017).</p> <p>In respect of need and exceptional circumstances for these employment allocations, previous representations by the site promoter demonstrate the success of Stanmore Business Park and the need for existing businesses to grow. Appendix 2 of this representation provides an updated position on occupation of the business park and alternative locations for employment in Bridgnorth. It confirms the business park is running at capacity with sites refurbished as they become available before being re-let.</p>
A0497	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Schedule S3.1(iii) Potential Future Direction of Growth	Not Specified	No	Not Specified	<p>Object to the development strategy for Bridgnorth including land west of Tasley Garden Village as a Potential Future Direction of Growth, it is not justified or effective as the evidence base does not support the strategy to allocate Tasley Garden Village (BRD030), taking into account reasonable alternative at Stanmore Garden Village (BRD032). Representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of this representation) remain relevant.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0497	B002	BRD030 should be deleted and Stanmore Garden Village (BRD032) (part) should be allocated for 70ha comprising 850 dwellings, 16ha employment land, new local centre and green space.	Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken, which included consideration of an appropriate range of factors used to identify constraints and opportunities.	No
A0497	B003	The first paragraph of the proposed site guidelines for P58a and STC002 should be amended to specify development will be in B2, B8, E (g) (i) (ii) and (iii) and appropriate sui generis uses. References to Stanmore Industrial Estate should be updated to Stanmore Business Park.	Noted. Proposed allocations P58a and STC002 are targeted towards the engineering and advanced manufacturing sectors, reflecting the aspirations of the Shropshire Economic Growth Strategy and the opportunities that exist to build upon the critical mass of these uses present on the existing Industrial Estate. However, these allocations are also intended to complement the existing employment offer on the site, which includes elements within use class E (g) (i) (ii) and (iii) - complementary to the engineering and the advanced manufacturing businesses on site. Reflecting on this, it is considered appropriate to propose a minor modification to the draft site guidelines for proposed allocations P58a and STC002 captured within Schedule S3.1(ii), to allow for use classes E(g)(i), (ii) and (iii), where this is complementary to engineering and the advanced manufacturing activities and the primary use classes B2, B8 and sui generis.	Yes
A0497	B004	Land west of Tasley Garden Village (41.5ha) should be deleted and Land Safeguarded for Future Development at Stanmore Garden Village (BRD032) (part) 33 ha should be allocated.	Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Specifically in relation to the identification of a potential future direction of growth, this approach is considered appropriate for Bridgnorth in order to provide certainty about the ability to meet future development needs.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0497	B005	Sustainability Appraisal	Chapter 10	Not Specified	No	Not Specified	<p>Representations made to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of this representation) remain relevant. Changes to reflect comments in respect of limitations of the methodology on proximity to employment and assessment of heritage assets have not been made.</p> <p>Table 10.1 Assessment Matrix of the Regulation 19 Sustainability Appraisal (SA) of Sites Criteria 13 and 14 (heritage) do not match the site-specific assessments in the Annex D Bridgnorth. The criteria are also different to the earlier Regulation 18 SA. As shown in Table 10.1, criteria 13 would mean a listed building within a site would not be recorded, and criteria 14 would only record the top two grades of listed buildings (i.e. a grade II listed building would not be recorded) and the buffer has changed.</p> <p>As there is no text to suggest the criteria assessment has been purposely amended, it is thought Table 10.1 has been altered in error. This needs amendment or clarification as to why it has changed.</p> <p>Object if Table 10.1 criteria 13 and 14 have been changed purposefully and Annex D site specific assessment is incorrect.</p>
A0497	B006	Sustainability Appraisal	Sustainability Appraisal Appendix D Bridgnorth Place Plan Area	Not Specified	No	Not Specified	<p>As Stanmore Garden Village (BRD032) scores better than Tasley Garden Village (BRD030) the evidence base does not support allocation of BRD030, as a more sustainable alternative exists.</p> <p>Within the assessment, justification is required with respect to trees subject to Tree Preservation Orders (TPO's). Footnote 2 of Table 10.1 Assessment matrix of the Regulation 19 Sustainability Appraisal (SA) of sites, states TPO's within 30m of a site boundary (stated to be "advised by Shropshire's Tree Team") score a negative. Justification of why this distance is appropriate is required given it goes beyond the maximum root protection area and in terms of any other indirect impact, is considered arbitrary.</p> <p>Welcome assessment of Stanmore Garden Village (BRD032) as an individual site, rather than as a series of sites.</p> <p>Note that BRD032 is now correctly scored in relation to ancient woodland and landscape sensitivity. However, explanation required in relation to TPO's - why is 30m used and where are these trees located.</p>
A0497	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Bridgnorth	Not Specified	No	Not Specified	<p>Object to the development strategy for Bridgnorth which is not justified or effective as the evidence base does not support the strategy to allocate BRD030 (Tasley Garden Village), taking into account the reasonable alternative at BRD032 (Stanmore Garden Village).</p> <p>The Sustainability Appraisal (SA) shows the Tasley Garden Village performs poorly and there is a better alternative at Stanmore Garden Village. Furthermore Stanmore Garden Village is the only deliverable option.</p> <p>Agree that Bridgnorth is a Principal Centre. As the only Principal Centre in east Shropshire its role is serving not just its residents but also those in its hinterland that rely on it for its extensive range of services, facilities and employment opportunities. Proximity to the conurbation also offers considerable potential to attract investment into Shropshire and to trade into these larger urban markets.</p> <p>The increase in the level of housing and employment proposed needs to be justified.</p> <p>As the justification for additional employment land is attracting inward investment and providing for growth of existing businesses, it follows employment provision should be close to their existing locations.</p> <p>12ha of employment land at Stanmore Business Park (a successful well occupied site accommodating around 40 businesses many associated with engineering and advanced manufacturing and some major employers, with demand for expansion land. It also contains the Marches Centre for Manufacturing and Technology a state of the art training centre), to allow for growth of existing businesses is justified. A socio-economic study supports growth in this location, which forms an Appendix to this representation.</p> <p>Consider Stanmore Garden Village can address the evidential matters of why the growth is needed; why it is has to be in this location (links to the M54 strategic corridor and key opportunity to support the cluster of activities and key sectors in Bridgnorth and work with existing companies on future plans); provide balanced development of housing and employment supported by new community facilities and a local centre; can reduce out-commuting and enhancing sustainability of the existing development at The Hobbins and the Stanmore Business Park. The main constraint is Green Belt, but consider exceptional circumstances exist see wider representation.</p> <p>Representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of this representation) remain relevant.</p>
A0497	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2(2)	Not Specified	No	Not Specified	<p>Welcome change to Part 2 of Draft Policy SP2 to ensure that sufficient land 'in the right locations' is available to achieve growth aspirations. However, consider this is not followed through in allocations. Land in the right location in Bridgnorth has not been identified as the proposed allocation is not considered deliverable and is on the wrong side of the town. As such draft Policy DP2 is unsound as it is not effective and may lead to under delivery of housing and employment land.</p> <p>Part 2 of Draft Policy SP2 rightly commits to keeping availability of land under review to ensure a continuous supply of suitable sites. However, it does not propose any recourse in the event allocations are found to be unavailable, as such it is unsound as it is not effective. It needs to set out/cross-reference another policy specifying how flexibility is provided if a major site is not available and not delivered. Draft Policy SP7 Managing Housing Development adds some flexibility to allow housing if a shortfall in the Plans residential development guideline for a settlement arises but this could lead to ad hoc site approvals rather than planned development.</p> <p>To avoid a review of the Local plan in the case of non-delivery, which could cause significant delay, an option could be for a Neighbourhood Development Plan to bring forward an alternative.</p> <p>It is imperative that land in the right location in Bridgnorth is identified, as the strategy relies on a single major garden village allocation, which if it does not deliver for any reason, means there will be a shortfall of housing in Bridgnorth. Consider the proposed allocation of 1,050 houses at Tasley Garden Village (BRD030) in Bridgnorth will not be delivered (see wider representation). An allocation at Stanmore Garden Village (BRD032) is more likely to deliver a cohesive development of housing, employment and community infrastructure.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0497	B005	<p>Table 10.1 of the Sustainability Appraisal should be amended. Site-specific assessments should also be amended as a consequence.</p> <p>To address SO6: Reduce the need of people to travel by car, Criteria No. 5 or 6 should be amended to add to 'site boundary within 480m of a protected employment site'.</p> <p>To address SO15: Conserve and enhance features and areas of heritage value and interest, Criteria No. 13 and 14 should be amended to reflect significance, not distance. Criteria 13 and 14 to be corrected with reference to listed buildings and grade II listed buildings.</p>	<p>Table 10.1 incorrectly omits the criteria 'site contains a Listed Building', however, the SA matrix for the Bridgnorth does score sites against this criteria. No change proposed.</p> <p>With regard to the other issues raised, the Council considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.</p>	No
A0497	B006	<p>BRD030 should be deleted and Stanmore Garden Village (BRD032) (part) should be allocated for 70ha comprising 850 dwellings, 16ha employment land, new local centre and green space.</p> <p>Provide explanation of 30m distance used for trees subject to TPO protection.</p>	<p>Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of an appropriate range of factors used to identify constraints and opportunities. This site assessment process is considered proportionate and robust.</p> <p>Within the SA, criteria 3 relating to presence of tree preservation orders (TPO's) is whether they are on or within 30m of the site, as advised by the Council's Tree Officers. In addition to being identified as Ancient Woodland, trees located along Hermitage Ridge are subject to a group TPO.</p>	No
A0497	B007	<p>The Strategy should set out the key issues for Bridgnorth, the constraints that are significant in determining a strategy to direct growth and identify a deliverable development to meet the identified need.</p> <p>Key issues are the need for more affordable housing; addressing imbalance between housing and employment; and improving access to community facilities and open space.</p> <p>Search for sites should be specified with the focus on the constraints of the settlement formed by the river and its floodplain; the landscape sensitivity to the north and south west; the physical barrier of the A458 southern by-pass; and the Green Belt to the east. Stanmore Garden Village should be recognised as a deliverable allocation for a garden village to address the key issues and have regard to the constraints of the settlement.</p>	<p>Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken, which included consideration of an appropriate range of factors used to identify constraints and opportunities.</p>	No
A0497	B008	<p>Part 2 of draft Policy SP2 needs to be flexible and adaptable in the event land allocated is not available and it should specify a specific course of action to rectify a situation where a site allocated is not coming forward. Such recourse should be a review of the Local Plan, a Neighbourhood Development Plan to identify alternatives or a planning application in accordance with SP7.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy SP7 stipulates the approach where there is clear evidence that clear evidence that the residential development guideline for a settlement appears unlikely to be met over the plan period.</p> <p>Shropshire Council has always taken a positive and proactive approach to Neighbourhood Plans and has sought to work constructively with local areas to advance their aspirations.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0497	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2(3)	Not Specified	Yes	Not Specified	Support.
A0497	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2(5)	Not Specified	Yes	Not Specified	Support.
A0497	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Not Specified	No	Not Specified	Representations to the Regulation 18 Pre-Submission Draft Plan (Appendix 1 of this representation) remain relevant and the plan is unsound as it is not justified or effective. Support that development in Shropshire will help bring a transition to a zero-carbon economy. Draft Policy SP3 should recognise the contribution of land use planning to support the transition to a zero-carbon economy. Measures identified can be achieved in selecting the location of sites to be allocated and the benefits of a juxtaposition of uses (not just about directing development to sustainable settlements but sustainable locations within a settlement, such as those which can reduce commuting).
A0497	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	Not Specified	Yes	Not Specified	Support a positive approach to sustainable development and recognition of the presumption in favour of sustainable development in the National Planning Policy Framework (NPPF).
A0497	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Not Specified	Yes	Not Specified	Support delivery of high-quality design in new development to ensure the creation of better places; promote individual and community well-being; and enhance the way places are enjoyed and experienced by those who live, work or visit. Stanmore Garden Village (BRD032) has a focus on high quality design with a legacy landowner that has the ability to deliver above the standard. A principles that underpins Garden Communities is: "Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities and including opportunities to grow food." The legacy landowner at Stanmore Garden Village (BRD032) can deliver. through use and control of local and regional housebuilders, a vision with building design and features relating to locally distinctive development and bring innovative design that will positively contribute to the character, appearance and local identity of the area. It would be planned as a settlement with cohesive layout and design. Stanmore Garden Village (BRD032) would create a real sense of place that will become the heart of the development. The Community Centre will be designed for traditional retail uses selling local produce, alongside a café and associated leisure and cultural facilities, in buildings where elevations respond to their surroundings and position within the settlement. Promoters of Stanmore Garden Village (BRD032) are committed to the principle of Garden Village design. They have recruited the renowned authority on such developments, Lord Matthew Taylor, as a principal adviser on the scheme. He is involved in the delivery of a number of Garden Communities in the UK created by Government's Garden Communities programme.
A0497	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	No	Not Specified	Support the change of draft SP11 Policy from a Development Management to Strategic policy. Consider representations to the Regulation 18 Pre-submission Draft Plan (Appendix 1 of this representation - this draft Policy was formerly known as draft Policy DP25) remain relevant and the plan is unsound. It is not justified as the evidence base is defective. Specifically the Green Belt Study methodology needs revising, particularly in relation to Purpose 3. Required revisions could result in different outcomes. Consider that Stanmore Garden Village does not cause the level of harm to Green Belt concluded within this Study. This is supported by a technical assessment which forms an appendix to this representation. As a result, Stanmore Garden Village (BRD032) should be released from Green Belt, not just the proposed employment allocations adjacent to Stanmore Business Park.
A0497	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Not Specified	Yes	Not Specified	Aims and objectives of draft Policy SP12 are appropriate and supported. Bridgnorth, a Principal Centre, is well placed geographically to attract inward investment and meet economic needs. It has a high level of sustainability with a vast range of services and facilities that makes it a suitable location for growth.
A0497	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	Not Specified	No	Not Specified	Consider representations to the Regulation 18 Pre-submission Draft Plan (Appendix 1 of this representation - this draft Policy was formerly known as draft Policy SP11) remain relevant. Inclusion of updated employment use classes to reflect the change in the Use Classes Order 1987 (as amended) is supported and needs to be followed through to site allocations. However, as a result of amendments, employment policies in SP12, SP13 and SP14 together, have become overcomplicated and repetitive, this could deter employment development. The draft polices together need clarity on what they actually relate to. For example, they conflate a strategy to select sites to allocate, guiding development on allocated sites and consideration of sites not allocated. A simplified approach would be welcomed that will allow employment growth to flourish. The Council's approach makes the plan unsound as the policies are not effective and delivery of employment sites may be unintentionally hindered as a result.
A0497	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Not Specified	Yes	Not Specified	Support Bridgnorth being within the eastern belt strategic corridor as a recognised location to attract inward investment and support growth. Draft Policy SP14 is however considered to be over complicated and should focus on allocated sites.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0497	B009	N/A	Noted.	No
A0497	B010	N/A	Noted.	No
A0497	B011	Paragraph 1 of draft Policy SP3 should include a new criterion stating "Sites for development should be located so as to reduce the distance travelled to jobs having regard to commuting patterns; and housing should be located close to jobs so as to reduce the need to travel."	Shropshire Council considers that draft Policy SP3 provides an appropriate mechanism to support the transition to a zero-carbon economy. Shropshire Council also considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Furthermore in identifying proposed site allocations a comprehensive site assessment process has been undertaken, which is considered appropriate, proportionate and robust.	No
A0497	B012	N/A	Noted.	No
A0497	B013	N/A	Noted.	No
A0497	B014	Revise the methodology used within the Green Belt Study. Release Stanmore Garden Village (BRD032) from the Green Belt. Modify Table SP11.1 Green Belt Release by Location and Type to include Stanmore Garden Village (BRD032) for 70ha of mixed use development and 33ha of safeguarded land (this would supersede the existing entry for Stanmore (Bridgnorth) as Stanmore Garden Village (BRD032) incorporates these proposed employment allocations.	Shropshire Council considers that the methodology used within the Green Belt Assessment and Review undertaken to inform the Local Plan Review is appropriate, proportionate and robust. This methodology was informed by responses received from Duty to Cooperate partners.	No
A0497	B015	N/A	Noted.	No
A0497	B016	The Strategy should set out the key issues for Bridgnorth in relation to delivering sustainable economic growth. Draft Policy SP13 needs to be simplified to allow, encourage and direct development direct to meet identified need. Draft Policy SP13 should recognise that development falling within new Use Class E (g) are suitable in particular uses that would fall into E(g) (i) offices (ii) Research and development (iii) light industrial.	Shropshire Council considers that Policy SP13 and the employment development strategy for Shropshire is appropriate, effective, sustainable and deliverable. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local Plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic.	No
A0497	B017	N/A	Shropshire Council welcomes the support for Policy SP14 as part of the employment development strategy for Shropshire which is considered to be appropriate, effective, sustainable and deliverable.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0498	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Not Specified	No	Not Specified	Clive should not be identified as a Community Hub as two services/facilities identified within the Hierarchy of Settlements Assessment are no longer presented. Specifically the bowling green is located within a private garden (and has been for 2 years) and the village shop has now closed (October 2020) and the owner has confirmed it will not be re-opening. Taking these out would lower its score to 47, meaning Clive would no longer exceed the threshold for Community hub status. The post office operates only 2-4 hours a week and as such does not warrant significant points for this service.
A0499	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	Not Specified	No	Not Specified	The draft Shropshire Local Plan is unsound as: -Shropshire Council delegated authority to run consultation meetings to a site promoter. -Shropshire Council changed its proposed option (increasing housing numbers) to meet landowners commercial needs after directly negotiating with them. -The Much Wenlock Neighbourhood Plan (MWNP) allows only small incremental housing developments and focuses on areas not liable to flooding. Shropshire Council also has a responsibility to take account of flood risk before considering new developments. MUW012VAR has flooded on numerous occasions, as such it is contrary to these. -No reference is made to enhancement of infrastructure (urgently needed to support proposals). -Draft Policy S13 has no consideration of the proposed redevelopment of the Former Ironbridge Power Station and the associated impact on Much Wenlock services and traffic problems. This current MWNP (democratically approved by the majority of Much Wenlock residents) has demonstrated it can meet the local development targets as such there is no proven need to deviate from it. Shropshire Council need to demonstrate the legal precedent or face legal challenge from local groups.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0498	B001	Update the Hierarchy of Settlements Assessment to remove the points attributed to Clive for the bowling green and village shop. This results in the settlements score dropping below Community Hub status. Remove Community Hub status from the settlement within the draft Shropshire Local Plan.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0499	B001	<p>Revert to the Much Wenlock Neighbourhood Plan (MWNP) and:</p> <ul style="list-style-type: none"> <li>-Continue with incremental development of affordable housing</li> <li>-Remove proposed allocation MUW012VAR from the plan until a proven flood alleviation scheme has been designed and implemented that covers this locality</li> <li>-Formulate and approve a plan to remove infrastructure constraints.</li> </ul>	<p>Noted. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement.</p> <p>Shropshire Council also considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0499	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13	No	Not Specified	Not Specified	<p>The draft Shropshire Local Plan is not legally compliant as it ignores/contradicts the Much Wenlock Neighbourhood Plan (MWNP), which has been democratically adopted by the Town through referendum. Specifically:</p> <ul style="list-style-type: none"> <li>-The MWNP safeguards local infrastructure (e.g. traffic, drainage, sewage, health through incremental sustainable development, but development proposals exceed those in the MWNP.</li> <li>-Housing proposed is not affordable and numbers are far in excess of demonstrable local need.</li> <li>-It ignores the legal duty regarding flood management by proposing large development without first demonstrably addressing the flooding issue.</li> <li>-Public consultation was devolved to site promoters (biased).</li> </ul> <p>The Secretary of State has confirmed "Once a neighbourhood plan has been approved at referendum, it forms part of the statutory development plan and becomes the starting point in making planning decisions."</p>
A0500	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>Draft Policy SP2 is not justified and is unsound as the identification of Community Hubs (through the Hierarchy of Settlements Assessment (HoS)) is not based on up to date or accurate evidence and updates to evidence in response to changes to local services and facilities have been inconsistent.</p> <p>Shropshire Council stated it would consistently apply the methodology for identification of Community Hubs within the HoS, however despite informal and formal consultation responses (including to the last Regulation 18 consultation) highlighting changing evidence on availability of local services and facilities (loss of the convenience store) in Clive, these have not been taken into account. In contrast where Myddle lost its convenience store and the HoS was updated and Community Hub status was removed.</p> <p>Clive does not have the necessary associated services and facilities to represent a significant rural service centre or a Community Hub, as defined within the HoS and subsequent draft Shropshire Local Plan policies.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0499	B002	Adopt the building volumes, types, schedule and flooding / traffic proposals within the Much Wenlock Neighbourhood Plan (in line with the views of the majority of Much Wenlock residents).	<p>Noted. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides a development strategy for the settlement.</p> <p>Shropshire Council also considers that the proposed development strategy for Much Wenlock and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>The identification of proposed allocations have been informed by a comprehensive site assessment process, including consideration of issues such as flooding and highways. The draft Shropshire Local Plan has also been subject to a Stage 1 and Stage 2 Strategic Flood Risk Assessment, which alongside discussions with colleagues in the Flood and Water Management Team, have informed proposed site guidelines for MUW012VAR.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No
A0500	B001	Remove reference to Clive as a Community Hub.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0500	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	<p>Draft Policy SP8 states Community Hubs have been identified through a Hierarchy of Settlements Assessment (HoS). However the evidence within the HoS is not based on accurate information and its application does not meet the intended definition of a Community Hub/overall settlement hierarchy needed to maintain overall sustainability and therefore Policy SP8 is not justified and unsound.</p> <p>Shropshire Council consider the methodology within the HoS has been consistently applied, however informal and formal consultation responses have identified inaccuracies which have not been responded to, rendering the draft Shropshire Local Plan, draft Policy SP8 and associated schedule SP2.2 unsound. Specifically, the HoS for Clive includes a bowling green as an outdoor sports facility and a convenience store. Neither now exist following their closures (the shop has closed 3 times in recent years and is clearly unviable):</p> <ul style="list-style-type: none"> <li>-The loss of the bowling green was recognised within the Shropshire Council Playing Pitch and Outdoor Sports Strategy Assessment Report (PPOSS) (Oct 2020), which should supersede the Open Space Needs Assessment (OSNA) (2017 desk based assessment using 2009 data) as it is based on more up to date and comprehensive information.</li> <li>-Shropshire Council has also acknowledged receiving correspondence from the Parish Council and convenience store owner regarding its closure. This has been confirmed through submission of a Planning Application (21/00048/FUL) for change of use to a residential annexe.</li> </ul> <p>Revisions to the HoS evidence has also led to inconsistencies in the definition of Community Hubs and their identification - the definition states settlements considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities (emphasised); and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities', however the criteria threshold no longer requires such facilities to be present. This is illustrated by Clive which evidently does not have the services necessary to meet day to day needs, such as employment and convenience goods.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0500	B002	Remove reference to Clive as a Community Hub.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirements to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0500	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2	Not Specified	No	Not Specified	<p>Draft Policy S17.2 is unsound as draft Policies SP2 and SP8 are unsound. Community Hubs in draft Policy S17.2 have been identified through a Hierarchy of Settlements Assessment (HoS). However the evidence within the HoS is not based on accurate information and has not been consistently applied in relation to changing services/facilities provision, therefore Policy S17.2 is not justified and unsound.</p> <p>Specifically, the HoS for Clive includes a bowling green as an outdoor sports facility and a convenience store. Neither now exist following their closures and are in residential ownership:</p> <p>-The loss of the bowling green was recognised within the Shropshire Council Playing Pitch and Outdoor Sports Strategy Assessment Report (PPOSS) (Oct 2020), this is a comprehensive assessment and should supersede the Open Space Needs Assessment (OSNA) (2017 desk based assessment using 2009 data) as it is based on more up to date and comprehensive information and the OSNA itself acknowledges that “without a catchment area analysis it cannot detect the reality of variations in provision within each Place Plan Area”.</p> <p>-Shropshire Council has also acknowledged receiving correspondence from the Parish Council and convenience store owner regarding its closure. This has been confirmed through submission of a Planning Application (21/00048/FUL) for change of use to a residential annexe.</p> <p>Shropshire Council stated it would consistently apply the methodology for identification of Community Hubs within the HoS, however despite informal and formal consultation responses (including to the last Regulation 18 consultation) highlighting changing evidence on availability of local services and facilities (loss of the convenience store) in Clive, these have not been taken into account. In contrast where Myddle lost its convenience store and the HoS was updated and Community Hub status was removed. Similar changes occurred in Cockshutt and Westbury which were also reflected. Also, for other changes no evidence was required, however Clive was asked to demonstrate further evidence, thereby deferring the decision.</p>
A0501	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>
A0501	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0500	B003	Remove reference to Clive as a Community Hub.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0501	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0501	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0501	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0501	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0501	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0502	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0502	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0501	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0501	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0501	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0502	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0502	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0502	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0502	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0502	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0503	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0503	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0502	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0502	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0502	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0503	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0503	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0503	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0503	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0503	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0504	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S5.1 CST020	Not Specified	No	Not Specified	CST020 has been amended with access from the top of Sandford avenue avoiding access direct from Sandford Avenue which would have had an adverse environmental impact in relation to the avenue of Lime trees that run along the avenue which are all long standing TPO trees. The house types suggested are smaller affordable and open market units. The proposals in the Local Plan do not deliver the strategy and are objected to as being unsound because they make no provision for any new housing sites and only include two sites which failed to deliver any housing in the last plan period. It is contended that the lack of any housing allocations proposed for this Key settlement make the LP review outcomes unsound.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0503	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0503	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0503	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0504	B001	It is contended this site put forward for consideration for inclusion in the SLAA and LPR at Regulation 18 stage, as modified, is entirely acceptable in landscape terms and compatible with the existing pattern of development in the town as well as assisting the long-term sustainability and deliverability for the town as a whole. The CST020 site is in single family ownership, is not in the Green Belt, has no known legal or physical constraints or impediments and can be delivered quickly in accordance with the requirements of the NPPF and by a Local Shropshire developer. Its allocation for a housing development will contribute to the soundness of the plan which will provide much sought after lower and mid-range second stage housing for the settlement.	Shropshire Council considers that the proposed development strategy for Church Stretton and the existing commitments (including the existing allocations) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities, including its location within the Shropshire Hills AONB.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0505	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4 WBR007	Not Specified	No	No	Cannot ask ordinary consultees if the Draft Shropshire Local Plan is legally compliant, frankly wont know. However, consider it is not sound and seems to be at odds with the Duty to Co-operate. Within the process site assessments of WBR007, WBR008 and WBR010, have not been considered together. Taken together, these sites would represent approximately a 50% increase in the number of dwellings within Worthen. It would seem reasonable that such a significant change to the community should be assessed and part of the appraisal. In addition there has to be an assessment of that if taken together would this represent Sustainable Development (SP4). This issue has not been considered, it therefore follows the issue strategic policy is not being followed which is part of the National Planning Policy Framework. I and my MP have asked this question of the council in writing and it has also been a subject raised in Cabinet questions by myself but has received no answer only the response to raise it here as part of this consultation response.
A0505	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4 WBR008	Not Specified	No	No	Not sure you can ask an ordinary consultee if the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is legally compliant, frankly I do not know. It is however it's not sound and would seem to be at odds with the Duty to Co-operate. Within the process site assessments of WBR007, WBR008 and WBR010, have not been considered together. Taken together, these sites would represent approximately a 50% increase in the number of dwellings within Worthen. It would seem reasonable that such a significant change to the community should be assessed and part of the appraisal. In addition there has to be an assessment of that if taken together would this represent Sustainable Development (SP4). This issue has not been considered, it therefore follows the issue strategic policy is not being followed which is part of the National Planning Policy Framework. I and my MP have asked this question of the council in writing and it has also been a subject raised in Cabinet questions by myself but has received no answer only the response to raise it here as part of this consultation response.
A0505	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4 WBR010	Not Specified	No	No	The proposal for site WBR010 in the 'Reg 19 pre-submission draft local plan' does not take into account the previous planning appeal refusal (14/00398/out) which was upheld by the Planning Inspector. This approach is flawed in that the same issues that determined the Planning Inspectors decision in the last planning plan are prevalent in the current proposed plan so do they need to be taken into account in the assessment of site. I have had a response to a written question to the council that the previous planning appeal refusal was in the context of the previous plan and so has no bearing on the current plan. A "that was then, and this is now" attitude. I would argue that they whilst the decision may only be applicable to the previous plan, the issues raised considered in the Planning Inspectors review and assessment of the site are relevant and should be considered. Merely saying, because it was against the previous plan and is of no relevance to the proposed plan, prevents the issues seen by the Planning Inspector being considered, and so the assessment is incomplete. All the above are relevant to the current selection criteria in the management of Community Hubs (SP9 & 10) and have been ignored by the council's selection process. It should also be noted that the previous planning application was for 25 and in this Local Plan is for 20 houses. The plot in WBR010 is far bigger and could accommodate 40 or more dwellings. This does not make sense unless there is a plan to vary the number of dwelling it the WBR010 plot is included within the plan, so frustrating any objections to a larger development. Within the process site assessments of WBR007, WBR008 and WBR010, have not been considered together. Taken together, these sites would represent approximately a 50% increase in the number of dwellings within Worthen. It would seem reasonable that such a significant change to the community should be assessed and part of the appraisal. In addition there has to be an assessment of that if taken together would this represent Sustainable Development (SP4). This issue has not been considered, it therefore follows the issue strategic policy is not being followed which is part of the NPPF
A0506	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	Consider the methodology used to identify Community Hubs is too rigid and insensitive to needs and desires of local communities. If the scoring system wrongly categorises a particular village, it will lead to unsuitable levels of development and disharmony in communities. As such, draft Policy SP2 is not effective in achieving stated aims and conflicts with the National Planning Policy Framework (NPPF) - not responsive to local circumstances/needs as per para 77 of the NPPF and will not promote sustainable development in rural areas or enhanced the vitality of rural communities as per para 76 of the NPPF. Support submission made by Longden Parish Council and Longden Village Action Group. Submission supported by other residents (documented within an Appendix to this representation).
A0506	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	No	Not Specified	The community of Longden are unanimously opposed to Community Hub status. Concerned identification of Longden as a Community Hub with a development boundary and no allocations could lead to exhaustion of infill sites and pressure to develop outside the development boundary (as experienced between 2014 and 2020 when the Parish Council and Longden residents withstood development pressure, resulting in four appeal being dismissed, but with a settlement guideline which is unrealistic to achieve within the village). Draft Policy SP7 in addition to draft Policy SP8 are significant problems for Longden. Support submission made by Longden Parish Council and Longden Village Action Group. Submission supported by other residents (documented within an Appendix to this representation).

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0505	B001	Reassess the site WBR010 together with WBR007 and WBR008 because they share the same infrastructure, communications, transport, drainage as well as community. Outcomes of reassessment can't be reviewed until this has happened.	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is compliant with the NPPF, appropriate, effective, sustainable and deliverable.	No
A0505	B002	Reassess the site WBR010 together with WBR007 and WBR008 because they share the same infrastructure, communications, transport, drainage as well as community. Outcomes of reassessment can't be reviewed until this has happened.	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is compliant with the NPPF, appropriate, effective, sustainable and deliverable.	No
A0505	B003	Reassess the site WBR010 together with WBR007 and WBR008 because they share the same infrastructure, communications, transport, drainage as well as community. Outcomes of reassessment can't be reviewed until this has happened.	All the proposed site allocations in Worthen have been informed by a proportionate and robust site assessment process. Furthermore, the Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.	No
A0506	B001	Longden should not be identified as a Community Hub, rather it should form a Community Cluster. Draft Policy SP7 should be modified to ensure large scale development proposals for affordable housing outside Community Clusters will not be approved.	Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden. As such it is considered appropriate for Longden to be identified as a proposed Community Hub. However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach. Shropshire Council also considers that draft Policy SP7, alongside other relevant draft Shropshire Local Plan policies, is an appropriate and effective means of managing housing development.	No
A0506	B002	Longden should not be identified as a Community Hub, rather it should form a Community Cluster. Draft Policy SP7 should be modified to ensure large scale development proposals for affordable housing outside Community Clusters will not be approved.	Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden. As such it is considered appropriate for Longden to be identified as a proposed Community Hub. However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach. Shropshire Council also considers that draft Policy SP7, alongside other relevant draft Shropshire Local Plan policies, is an appropriate and effective means of managing housing development.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0506	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	<p>Process for identifying Community Hubs (Hierarchy of Settlements Assessment (HoS)) was developed mid-way through the Local Plan Review process. Initially Longden was not identified as a Community Hub, however this was later revised and the settlement re-classified. Do not consider Longden should be identified as a Community Hub as it will adversely affect the balance of the community and fail to achieve sustainable development/retain rural vitality. Also consider that the HoS is not sufficiently sensitive to the needs of communities and should be reconsidered (Longden is on the limit of the Community Hub threshold change to one score would change its status, it should also be apparent that a village like Longden should not have the same approach as larger villages like Minsterley). As such it is not properly justified or evidenced and will not deliver sustainable development.</p> <p>Within the currently adopted Local Plan, Longden is part of a Community Cluster. This was considered acceptable by residents and its development guideline was achieved without a development boundary or site allocations (although following adoption, there was significant pressure for new housing (6-60 dwellings) on the periphery of the village, encouraged by Council Planning Officers, but refused at appeal).</p> <p>In the draft Shropshire Local Plan, the proposed residential guideline of 50 dwellings to be achieved by infill development within a tightly drawn development boundary. Consider the proposed residential guideline is inappropriate for the village (represents a 37% increase in the size of the village, too large to be assimilated into the settlement, especially over 17 years - only 2 of the proposed Community Hubs have a smaller population and several settlements not chosen to be Community Hubs have a much larger population) and that a development boundary should not be identified. Very concerned categorisation of Longden as a Community Hub will encourage further applications on the periphery of the village which will become difficult to resist.</p> <p>Concerned identification of Longden as a Community Hub with a development boundary and no allocations could lead to exhaustion of infill sites and pressure to develop outside the development boundary (as experienced between 2014 and 2020 when the Parish Council and Longden residents withstood development pressure, resulting in four appeal being dismissed, but with a settlement guideline which is unrealistic to achieve within the village). Draft Policy SP7 in addition to draft Policy SP8 are significant problems for Longden. This concern is compounded by provisions of draft Policy SP7 which allows for cross-subsidy development (affordable housing cross-subsidised by a percentage of open market housing) immediately adjoining the built form of Community hubs and Community Clusters, which will encourage development outside the proposed development boundary for Longden.</p> <p>Support submission made by Longden Parish Council and Longden Village Action Group. Submission supported by other residents (documented within an Appendix to this representation)</p>
A0506	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP7	Not Specified	No	Not Specified	<p>Concerned draft Policy DP7 which allows for cross-subsidy development immediately adjoining the built form of Community Hub and Community Cluster settlements, will encourage development outside the proposed development boundary for Longden (as experienced between 2014 and 2020 when the Parish Council and Longden residents withstood development pressure, resulting in four appeal being dismissed, but with a settlement guideline which is unrealistic to achieve within the village) and ensure any development within the proposed development boundary is purely open market housing.</p> <p>Support submission made by Longden Parish Council and Longden Village Action Group. Submission supported by other residents (documented within an Appendix to this representation).</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0506	B003	Longden should not be identified as a Community Hub, rather it should form a Community Cluster.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). It should be noted that this windfall allowance includes appropriate cross-subsidy and exception development where it is consistent with Community Hub Policy SP8 and other relevant policies of this Local Plan. This is considered an appropriate, effective, sustainable and deliverable approach.</p> <p>Shropshire Council also considers that development boundaries are an effective means of providing certainty to all parties (local communities, the decision maker and development industry).</p>	No
A0506	B004	<p>Longden should not be identified as a Community Hub, rather it should form a Community Cluster.</p> <p>Draft Policy SP7 should be modified to ensure large scale development proposals for affordable housing outside Community Clusters will not be approved.</p>	<p>Noted. Shropshire Council considers that draft Policy DP8 complements other mechanisms for achieving affordable housing delivery. Requirements for its application include demonstration that no public grant is available and an affordable exception scheme is unviable and a proven local affordable housing need.</p> <p>With regard to development within the proposed Longden development boundary, any affordable housing provision would be calculated in accordance with draft Policy DP3.</p> <p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach.</p> <p>Shropshire Council also considers that draft Policy SP7, alongside other relevant draft Shropshire Local Plan policies, is an appropriate and effective means of managing housing development.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0507	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	Not Specified	No	Not Specified	<p>The definition of Community Clusters within draft Policy SP9.1 is looser than that in the adopted Local Plan, being no longer based on provision of services and allowing any amount of small settlements to be included.</p> <p>Maesbury and Maesbury Marsh abut each other and share community facilities (do not rely on other small communities). They are an example of what Community Clusters were originally envisaged to be, however they are not proposed as such within the draft Shropshire Local Plan and so would be regarded as countryside where development opportunities are limited. Shropshire Council refuses to accept they function as a single settlement on a day-to-day basis, but other proposed Community Clusters include two distinct elements.</p> <p>Further, Maesbury/Maesbury Marsh have a combined population of over 450 people, individually larger than many of the settlements proposed as Community Clusters and combined larger than combined proposed Community Clusters.</p> <p>Settlements identified as Community Hubs and Community Clusters have been identified based on a scoring system of existing services (Hierarchy of Settlements assessment (HoS)), in an attempt to redress the situation in the adopted Local Plan where status was determined by Parish Councils/be more objective. Villages not identified as Community Hubs, depending on size, provision of facilities and view of the Parish Council, can be designated a Community Cluster or countryside. Whilst this is more objective, it is not sufficiently sensitive to the needs of communities, as restrictions to development simply perpetuate trends of reducing sustainability.</p> <p>There appears questionable apportionment of points within the HoS for Maesbury and Maesbury Marsh, for instance in relation to the pre-school and local employment opportunities. Combining the scores for the two settlements would almost achieve Community Hub status.</p> <p>Planning policies over the last 20 years have resulted in Maesbury/Maesbury Marsh becoming less sustainable (loss of village shop and primary school). Consider Maesbury and Maesbury Marsh operate as a single entity and should be subject to detailed consideration of what is needed to make them more sustainable - this is the basic concept of draft Policy SP2, but scoring in the HoS is insufficiently sensitive to community needs and does not promote sustainability. Failure to identify Maesbury/Maesbury Marsh as a proposed Community Cluster is not in line with the proposed strategy in draft Policy SP2.</p>
A0507	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>The principal behind draft Policy SP2 and the ambition to ensure greater long-term sustainability for rural settlements is supported, but the manner in which Community Hubs and Community Clusters have been identified is not likely to produce development which will ensure long-term sustainability of rural settlements and, in some cases, will have the effect of making them less sustainable.</p> <p>Consider attempting to use an objective means of identifying Community Hubs and Community Clusters should be applauded, but the chosen methodology (scoring based on services) is not sufficiently sensitive to recognise the roles of certain villages, and thus they end up wrongly classified. Where a settlement has significant local services to support but is not allowed appropriate levels of housing, this can lead to closure of services and increased use of private motor vehicles.</p> <p>The scoring system therefore needs to be carefully and flexibly applied if the stated aims of Policy SP2 are to be achieved. At present it is too rigid, will not be effective in achieving the aims of draft Policy SP2 and is in conflict with para 77 of the National Planning Policy Framework (NPPF) as it is not responsive to local circumstances or reflective of local needs.</p> <p>The draft Shropshire Local Plan will not promote sustainable development in rural areas and will not enhance or maintain the vitality of rural communities as required by para 78 of the NPPF.</p>
A0508	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 (WRP001VAR)	Not Specified	Yes	Not Specified	<p>Confirm that site WRP001VAR is promoted for development and the proposed allocation is supported.</p>
A0509	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	Not Specified	No	Not Specified	<p>Proposed Community Clusters vary enormously in size, character, level of community infrastructure and distribution. Relationship between buildings.</p> <p>Draft Policy SP9 may be appropriate in some villages, but others may have difficulty finding 'infill' sites and demonstrate 'ability to accommodate' requirements. It is important that listed villages are capable of accommodating new residential development, otherwise needed windfall housing will not be delivered and the overall strategy will fail.</p> <p>Shropshire Council has not undertaken a capacity study to estimate how many dwellings can be constructed in proposed Community Clusters in line with proposed Policy SP9, without this it cannot be assumed draft Policy SP9 will produce the number of houses necessary and therefore it cannot be justified, evidenced or found sound.</p> <p>Suggest greater emphasis is placed on proposed development sites being appropriate to/reflective of the character and setting of the village in which it is located, rather than having arbitrary sizes and standards - particularly with regard to the definition of infill (may suit many situations but consider its unnecessary and could potentially be more harmful than the development it might or might not permit - many settlements have loose-knit relationships and insisting on infill development might force development into 'gaps' between buildings. These might represent infill plots in draft Policy SP9, but their development could significantly alter the character and appearance of the settlement and should be preserved/reduced/modified). Draft Policy SP9.2.c should be modified to allow development that is "infill or which would be appropriate to, or reflective of, the character of the settlement in which it is situated".</p> <p>Unclear how draft Policy SP9.4.e "appropriate mix of dwelling types, tenure and affordability", is to be put into effect when the development is to be restricted to three dwellings or less. If a particular mix of dwelling types, tenure or affordability is considered essential in any particular village, this should be specified in the draft Shropshire Local Plan (or Community Led Plans cross-referenced) - no evidence that an assessment has been undertaken to justify specific mixes for Community Cluster settlements, so this element of the draft Policy should be deleted.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0507	B001	Draft Policy SP9 should be revised to allow flexibility in identification of Community Hubs and Community Clusters when it is realised that settlements are becoming less sustainable and more reliant on private motor vehicles. Positive action should be taken to encourage such settlements to increase their sustainability.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. It is also considered that draft Policy SP9, alongside other relevant draft Policies, provides an appropriate framework for the management of development within proposed Community Clusters which can positively respond to the varying sizes and natures of Community Cluster settlements.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire. We would also note that Maesbury/Maesbury Marsh are classified as countryside within the adopted Local Plan. Where settlements are proposed to be identified as countryside for policy purposes, draft Policy SP10 provides the starting point for decision making, identifying the types of development that may be appropriate in such a location.</p>	No
A0507	B002	Draft Policy SP2 should be revised to allow flexibility in identification of Community Hubs and Community Clusters when it is realised that settlements are becoming less sustainable and more reliant on private motor vehicles. Positive action should be taken to encourage such settlements to increase their sustainability.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire.</p> <p>Where settlements are proposed to be identified as countryside for policy purposes, draft Policy SP10 provides the starting point for decision making, identifying the types of development that may be appropriate in such a location. This is also considered an appropriate approach which is effective, sustainable and deliverable.</p>	No
A0508	B001	N/A	Noted.	No
A0509	B001	<p>Draft Policy SP9.2.c should be modified to read: "On suitable small-scale infill sites of 0.1ha or less, or which would be appropriate to, or reflective of, the character of the settlement in which it is situated."</p> <p>Draft Policy SP9.2.e should be deleted.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. It is also considered that draft Policy SP9, alongside other relevant draft Policies, provides an appropriate framework for the management of development within proposed Community Clusters which can positively respond to the varying sizes and natures of Community Cluster settlements.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0509	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>Identification of Aston as an element within a Community Cluster which also includes Edstaston, Quina Brook, Northwood, Newtown, and Tilly, is supported.</p> <p>The percentage of development proposed in rural areas is significantly less than that within the adopted Local Plan. Proposals equate to around 8,470 houses to be delivered in the rural area. Deducting guidelines for Community Hubs, a shortfall of 2,538 dwellings (around 30%) are required in Community Clusters through windfall development (given there are generally no allocations). Given restrictions on development contained in draft Policy SP9, concerned Community Clusters will not produce the development necessary to deliver the number of houses required from this source.</p> <p>There are 99 villages across 32 proposed Community Clusters. but no estimates are provided on the numbers of houses to be delivered within these settlements, or whether they have capacity either in terms of available land or level of infrastructure to produce the housing needed.</p> <p>Unless such estimates are produced and found to be sensible and reasonable, the development to be constructed in Community Clusters must remain a guess at best. Delivery of the number of houses necessary therefore makes draft Policy SP2 unsound, as it is neither justified nor evidenced, and delivery cannot be assured.</p>
A0510	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 (GOB012)	Not Specified	Yes	Not Specified	<p>Support identification of Gobowen as a Community Hub with a proposed residential guideline of 360 dwellings in draft Policy S14.2.</p> <p>GOB012 was allocated in the SAMDev Plan, however delivery was delayed by unforeseen non-planning issues. These have been resolved and the site can be made available for development, as such its re-allocation is supported.</p>
A0510	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8 (GOB012)	Not Specified	Yes	Not Specified	<p>Support identification of Gobowen as a Community Hub in draft Policy SP8.</p> <p>GOB012 was allocated in the SAMDev Plan, however delivery was delayed by unforeseen non-planning issues. These have been resolved and the site can be made available for development, as such its re-allocation is supported.</p>
A0510	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP8	Not Specified	No	Not Specified	<p>Draft Policy DP8 states support for Gypsy and traveller sites will be forthcoming for suitable development proposals for sites within or close to Shrewsbury, Principal or Key Centres and Community Hubs or Clusters, or for exception sites which 'relate well' to those settlements and other allowable for exception sites or in accordance with draft Policy SP10.</p> <p>While draft Policy DP8.1 sets out a general presumption of support, it does not indicate how the effect of a gypsy or traveller development on other existing/proposed development or the natural/built environment should be taken into account. Often, the detailed effects of such development on local visual amenity, landscape character or residential property(ies), commercial operations or leisure facilities, that cause problems. These ought to be referred to in the criteria for considering the suitability of any particular site for such development.</p> <p>Draft Policy DP8.1.b and c refer to demonstrating a clear need, presumably against assessed needs for the County. However, need for such development ought to be demonstrated in relation to the particular site proposed, in the same way a scheme involving a rural workers dwelling has to be, and should only be permitted if there is a specific need for the particular site chosen.</p> <p>Para 4.83 of the explanation to draft Policy DP8 indicates the gross need identified by the GTAA is 24 pitches over the initial 5 year period with 113 pitches to 2038. The draft Shropshire Local Plan does not, however, indicate what should happen to proposals for further development, should those targets be reached before the end of the proposed Plan period. The Council's policy on over-provision should be made clear in the draft Policy DP8.</p> <p>Policy DP8.2 says all new sites should be in a sustainable location, reasonably accessible to education, health and welfare infrastructure and meet a number of facilities. This tends to push gypsy sites towards developed settings, but no evidence is presented to indicate those persons who would occupy permitted units would prefer to live in a developed setting - indeed, many may prefer to live a little way away from developed areas where the pressures for conformity do not exist to the same degree. This ought to be acknowledged in the draft Policy and advice given for situations where 'developed' and undeveloped locations are proposed.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0509	B002	Draft Policy SP2 and others that relate to development in Community Clusters should be modified to provide estimates of potential numbers of dwellings to be constructed in Community Clusters. Appropriate evidence of the likely availability of land to meet these estimates should be made available if it exists. By so doing it will become clear whether or not the contribution to the overall housing supply in the Council that will be made by Community Clusters will be sufficient to meet the overall housing delivery target.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. It is also considered that draft Policy SP9, alongside other relevant draft Policies, provides an appropriate framework for the management of development within proposed Community Clusters. As illustrated within Appendix 5 of the draft Shropshire Local Plan, as at 31st March 2019, 929 dwellings has been completed within the rural area beyond Community Hubs (including Community Clusters), a further 2,078 dwellings were committed on sites with Planning Permission or Prior Approval and 62 dwellings were committed on allocations without Planning Permission. It is considered that this supply, alongside other appropriate windfall opportunities that arise within proposed Community Clusters and the wider rural area will effectively contribute towards achieving the proposed strategic approach to the level and distribution of development.	No
A0510	B001	N/A	Noted.	No
A0510	B002	N/A	Noted.	No
A0510	B003	Draft Policy DP8 should be modified to indicate that the effect of a gypsy site on local visual amenity, landscape character, the natural environment and on residential, commercial and leisure facilities will be taken into consideration in considering the merits of an application for a Gypsy and Traveller site. Draft Policy DP8 should also be modified to make clear how the Council will deal with proposals for such development in the event that the assessed need has been provided.	Noted. Draft Policy DP8 reflects national policy in respect of Traveller sites, including locational and other expectations for sustainable development. National policy expects that, local planning authorities should 'very strictly limit new traveller site development in open countryside' and sets out relevant considerations. Draft Policy DP8 sets out the specific policy context in respect of Gypsy and Traveller development. However, the draft Shropshire Local Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP8, notably those set out in 2(a) to (h) , the relevant considerations, including those relating to amenity, environmental and other matters, of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations. Evidence in the form of the GTAA indicates that there is no strategic identified need and therefore no specific need for allocations. The GTAA does however recognise that some need for small sites will nevertheless arise where available supply does not meet need a specific requirement. National policy requires that where there is no identified need, criteria-based policies be included to provide a basis for decisions on any planning applications which are submitted. Draft Policy DP8 provides such a criteria-based policy to ensure that: there is a suitable mechanism to assess planning applications and a mechanism to consider non-strategic, arising needs for small sites. Since need must be considered on a planning application specific basis and matters such as alternative accommodation availability and the personal circumstances of applicants are relevant considerations, it would not be appropriate to impose limits on provision. There is however monitoring of planning applications and draft policy DP8 part 4(d) recognises the need to review evidence regularly, reconsider strategic requirements and progress allocations for new sites if required.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0511	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8 (Cockshutt)	Not Specified	No	Not Specified	<p>Community Hubs are considered significant rural service centres and the focus for development in the rural area. The manner in which they are proposed to be identified varies from the adopted Local Plan, which allowed communities to 'opt-in' based on the principle of localism - this failed as it did not produce the right quantity/type/distribution of housing and did not achieve rural re-balance. It is now proposed they will be identified through a Hierarchy of Settlements Assessment (HoS), using a point system.</p> <p>The HoS was prepared mid-way through the Local Plan Review process and updated at various points. Whilst many updates had little impact some re-classified settlements, which is very significant in terms of ability to grow and support local services. An example is Cockshutt, which was a main service village in the North Shropshire Plan; a Community Hub in the adopted Local Plan; and proposed to represent a Community Hub in the early part of the Local Plan Review, but ultimately was classified a Community Cluster due to loss of the convenience store. Cockshutt has a population of around 859 and around 350 dwellings, larger than 24 (57%) of the proposed Community Hubs, with some considerably less. Consider the system adopted is not sufficiently sensitive to community needs (not necessarily the same as community desires expressed by Parish Councils). A result of restrictions on development over the past 15 years is loss of local services and employment opportunities, increasing the need to travel elsewhere and making settlements, such as Cockshutt, less sustainable than it was.</p> <p>Appreciate the HoS is intended to focus on provision of services as an indication of settlement role. However, the scoring system is too rigid, with no flexibility to assess the true role of settlements or respond to short term/temporary changes to services without permanent consequences. Cockshutt has been a 'focus' village for provision of services for many years., its decline is linked to planning policies reacting to local wishes rather than analysis of the issues facing the village.</p> <p>Notable that there is a hole south-east of Ellesmere in the distribution of Community Hubs (illustrated on the map in the HoS), where Cockshutt has traditionally been the focus for services.</p> <p>Consider scoring for Cockshutt is incorrect as there is an 'amenity green space' in the village (land adjacent to the village's Millennium Hall (Community Hall) was gifted to the village in 2012 for use as amenity green space, and planning permission to change the use of that land (now known as Jubilee Field) from agriculture to amenity land was granted on 30 May 2017). This would mean Cockshutt attains Community Hub status.</p> <p>The problem with the HoS is it requires assessment of scores and what can be done to make settlements more sustainable but is used purely as a basis for distribution of development, rather than to allow consideration of whether additional development would support more /better services. This is especially important where settlements have traditionally been a centre for an extended local community (like as Cockshutt) and yet is suddenly calculated as not being appropriate for future support. The assessment should aim to increase sustainability rather than lessen it, which will be the result for Cockshutt.</p> <p>Cockshutt should be designated a Community Hub, provided with a development boundary (including allocation of land identified on the plan appended to this representation). This site has been available for development for over 20 years, but its development has been restricted by policy. Its allocation would allow further development in Cockshutt without adverse effect on existing properties. It would have access off the main road and could achieve improvements to the southern access to the village, good links into the village or on to Shrewsbury/Ellesmere, drainage infrastructure runs through the site, could deliver a new village shop, couple of small workshops, provide land for a doctors surgery and recreation space and additional open market/affordable housing. These would all increase the sustainability of Cockshutt.</p>
A0511	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 (Cockshutt)	Not Specified	No	Not Specified	<p>The principal behind draft Policy SP2 and the ambition to ensure greater long-term sustainability for rural settle-ments, is supported, but the manner in which villages have been assigned as either Community Hubs or Community Clusters is not. Consider this is not going to produce development that will ensure the long-term sustainability of rural settlements and, in some cases, will have the effect of making them less sustainable.</p> <p>Identification of Community Hubs or Community Clusters in an objective fashion is to be applauded, but the method chosen, (Hierarchy of Settlements Assessment (HoS)) a scoring system based on provision of services, is not sufficiently sensitive to recognise the role that certain villages perform, and thus settlements can be categorised in a way inappropriate to actual function. If a village is wrongly categorised (designated a Community Hub when it is not a small centre to which others look, or Community Cluster with significant local services to support but not permitted appropriate levels of hous-ing to provide this support), it can lead to closure of services and increased use of private motor travel. The scoring system adopted needs to be carefully and flexibly applied if the stated aims of draft Policy SP2 are to be achieved.</p> <p>Consider the HoS is too rigid, and will not be effective in achieving the aims of draft Policy SP2, and are in conflict with para 77 of the National Planning Policy Framework (NPPF) as it is not responsive to local circumstances or reflective of local needs.</p> <p>Proposals for the rural area equate to around 8,470 houses to be delivered. Deducing guidelines for Community Hubs, a shortfall of 2,538 dwellings (around 30%) are required through windfall development in the rural area. To ensure deliver an additional 10-15% of Planning Permissions will need to be granted, further increasing reliance on windfall. This cannot be guaranteed within the Draft Shropshire Local Plan as such it will not promote sustainable development in rural areas or enhance/main-tain the vitality of rural communities as required by para 78 of the NPPF.</p>

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A0511	B001	<p>Cockshutt should be re-evaluated and designated a Community Hub, with a settlement strategy, development boundary (including allocation of land on the plan appended to this representation (in whole or part) for mixed development including open market and affordable housing).</p> <p>The scoring system that is used to select Community Hubs and Clusters should be re-evaluated, and relevant policies should provide for a reassessment to be carried out at least once a year in order to react to changes in provision of local services.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including for Cockshutt.</p> <p>It is considered that draft Policies SP8 and SP9, alongside other relevant policies, provide an appropriate framework for the management of development within Community Hubs and Community Clusters respectively.</p>	No
A0511	B002	<p>Cockshutt should be re-evaluated and designated a Community Hub, with a settlement strategy, development boundary (including allocation of land on the plan appended to this representation (in whole or part) for mixed development including open market and affordable housing).</p> <p>The scoring system that is used to select Community Hubs and Clusters should be re-evaluated, and relevant policies should provide for a reassessment to be carried out at least once a year in order to react to changes in provision of local services.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including for Cockshutt.</p> <p>It is considered that draft Policies SP8 and SP9, alongside other relevant policies, provide an appropriate framework for the management of development within Community Hubs and Community Clusters respectively.</p> <p>As illustrated within Appendix 5 of the draft Shropshire Local Plan, as at 31st March 2019, 929 dwellings has been completed within the rural area beyond Community Hubs (including Community Clusters), a further 2,078 dwellings were committed on sites with Planning Permission or Prior Approval and 62 dwellings were committed on allocations without Planning Permission. It is considered that this supply, alongside other appropriate windfall opportunities that arise within proposed Community Clusters and the wider rural area will effectively contribute towards achieving the proposed strategic approach to the level and distribution of development.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0511	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9 (Cockshutt)	Not Specified	No	Not Specified	<p>The draft Shropshire Local Plan loosens the definition of Community Clusters to that applied within the adopted Local Plan, such that it is no longer based on provision of services and can be any amount of small settlements, including single settlements without relationships to others in terms of services. Cockshutt does not rely on any other villages for services. Indeed it acts, or has acted in the past, as a Community Hub to which other smaller settlements gravitated for services. Cockshutt, in turn, gravitated towards Ellesmere, designated a "Key Centre" in the Local Plan Review. Cockshutt clearly has a different role from the other smaller villages in the locality. No other proposed Community Cluster settlements have a population higher than Cockshutt and only one Community Cluster (containing 6 settlements) has a combined population that is higher. Noticeable that, although a Community Hub in the adopted Local Plan, Cockshutt was allocated just 20 new dwellings (on 5 sites), none of which had been delivered at the start of the Local Plan Review (some have now been delivered, but none will deliver affordable housing) and so are proposed to be saved within the draft Shropshire Local Plan. No new allocations are proposed in the draft Shropshire Local Plan. Cockshutt has become less sustainable as a result of planning policy over the past twenty years and has not achieved a rebalance of the community. Current proposals to restrict development to infill plots only, in a settlement that is already tightly developed, leave little opportunity for development and will not create conditions where further community services and facilities can be provided and sustained. The village needs new and sustained growth if it is to regain its sustainability. The village should be reclassified as a Community Hub, and serious consideration should be given to the manner in which new services can be provided and sustained in the settlement.</p>
A0512	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8 (BUCK001)	Not Specified	No	Not Specified	<p>Support proposed allocation of BUCK001. This is an important brownfield site for Bucknell, it can comply with all requirements of draft Policies S2.2 (although note S2.2.6 relates to impact on the River Clun SAC) and SP8, however draft Policy DP13 places significant obstacle in the way of its development. Every effort should be made by the Local Planning Authority (LPA) to bring it forward for development as quickly as possible.</p> <p>The site has also been allocated for development for 22 years, most recently in the SAMDev Plan (2015) for 70 dwellings. There have also been a number of Planning Applications on the site, the most recent remains undetermined. However, delivery has been delayed for numerous reasons but not willingness of the landowner.</p> <p>The SAMDev Plan states development in the Bishop's Castle area may "adversely affect the integrity of the River Clun SAC. Mitigation measures are required to remove harm arising from hydrological and water quality impacts on this internationally designated site ..... ", no readily available/understandable advice has been provided on what mitigation measures might be suggested and this remains unresolved. It also requires project level Habitats Regulations Assessment (HRA) for proposals where a likely significant effect on an internationally designated site may occur (the HRA was to be prepared by the LPA). It also specified proposals likely to have a significant effect on factors including priority species and priority habitats, would only be permitted "where it could be demonstrated that there is no satisfactory alternative means of avoiding such impacts and the social or economic benefits of the proposal outweigh the harm to the asset". No advice has ever been forthcoming from the LPA on the measures that might be regarded as mitigating effects on natural assets.</p> <p>A River Clun SAC Nutrient Management Plan (NMP) was prepared by Natural England (NE), the Environment Agency (EA) and the LPA, to identify those issues threatening the freshwater pearl mussels in the River Clun. It concluded the freshwater pearl mussel population was 'functionally extinct' (declining population and little evidence of recruitment), and estimated mussels would only survive for another 20 years if nothing was done. Therefore a series of targets for water quality in the River Clun should be adopted, although even if achieved, there was no guarantee the colony would be rejuvenated. Three main causes of problems for the mussels were phosphates, nitrates and silt, of which development was a major factor for only phosphate (majority associated with Waste Water Treatment Works (WWTW)). The NMP contained no specific actions a developer might take to make residential development acceptable. The LPA advised development cannot occur unless it demonstrates no phosphates generated would enter the River and it should also demonstrate betterment.</p> <p>Discharge from Bucknell WWTW into the River Clun is controlled by Severn Trent Water (STW) and the EA. In 2017, STW indicated they intended to solve the problem by diverting discharge to another watercourse. However, this did not occur, instead, STW installed additional phosphate stripping facilities. Understand this has improved water quality, but has not improved it to a level that would mean targets set in the NMP are achieved.</p> <p>Most recently, the LPA in association with NE have produced a document indicating that development will only be permitted which would involve discharge to the River Clun or its tributaries, if it can be shown that the development would be "nutrient neutral". There is no indication given as to how this could be measured, how it could be achieved, what effect it might have on the water quality in the River, or whether it would produce a situation where the pearl mussel colony might be rescued and rejuvenated.</p> <p>The Local Plan Review continues this situation. Bucknell is identified as a Community Hub and BUCK001 is reallocated, however is still constrained by the necessity to ensure that the freshwater pearl mussels in the River Clun are unharmed by the development. Draft Policy DP13 specifies the restrictions in the Clun catchment, but no advice is provided as to how identified objectives can be achieved. Clear that simply preventing development is not the answer, but very little appears to be happening that would help in other directions. One suggestion a refresh of the NMP, but these are clearly ineffective unless they include definitive/measurable actions on the part of those bodies responsible for water quality and comprise more than just preventing development.</p> <p>This situation effects more than just BUCK001. The River Clun catchment includes Bishop's Castle (Key Centre), Clun (Community hub) and Lydbury North (Community Cluster) amongst others. Allocations for residential development have not come forward due to the same problem. These allocations are to be saved and there is a clear need/demand for development, which continues to be recognised. As such, the draft Shropshire Local Plan should tackle the issue of the water quality in the River Clun in a pro-active manner, and bring forward positive proposals to be put into action by the various authorities that have responsibility for watercourses in the catchment in order that the development that is planned, wanted and needed can be delivered. Until the draft Shropshire Local Plan includes such proposals it cannot be regarded as being "sound" as it is not effective or been developed in a positive manner, fails to meet the responsibility of ensuring the survival of the pearl mussel colony and will also fail to deliver the dwellings (514) planned in the Clun catchment.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0511	B003	<p>Cockshutt should be re-evaluated and designated a Community Hub, with a settlement strategy, development boundary (including allocation of land on the plan appended to this representation (in whole or part) for mixed development including open market and affordable housing).</p> <p>The scoring system that is used to select Community Hubs and Clusters should be re-evaluated, and relevant policies should provide for a reassessment to be carried out at least once a year in order to react to changes in provision of local services.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including for Cockshutt.</p> <p>It is considered that draft Policies SP8 and SP9, alongside other relevant policies, provide an appropriate framework for the management of development within Community Hubs and Community Clusters respectively.</p>	No
A0512	B001	<p>The draft Shropshire Local Plan should be modified to include specific, positive, measures that will:</p> <ul style="list-style-type: none"> <li>i. Ensure the longevity of the freshwater pearl colony, and</li> <li>ii. Ensure that the development that is assessed as being necessary in the River Clun catchment can be delivered immediately upon the adoption of the draft Shropshire Local Plan.</li> </ul>	<p>Shropshire Council must comply with the Habitats Regulations and subsequent legal judgments (including the Dutch Nitrogen case) when determining planning applications which are likely to have an adverse effect on the River Clun SAC. This means that development in the river Clun catchment can only be permitted if it can be demonstrated that no adverse effect on the River Clun SAC will occur. The Council is unable to consent to planning applications in Bucknell (and the wider river Clun catchment) which do not meet this requirement. Policy DP13 plans positively for development in the Clun catchment whilst safeguarding the SAC, by setting out the criteria which planning proposals must meet to comply with the Habitats Regulations. A series of minor modifications to this policy and its explanation (see schedule of minor modifications) are proposed to provide additional clarity on legal compliance with the Habitats Regulations and Dutch Nitrogen Judgement and on processes to support policy implementation, including the assessment of nutrient neutrality and determination of mitigation measures.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0512	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 (BUCK001)	Not Specified	No	Not Specified	<p>Support proposed allocation of BUCK001. This is an important brownfield site for Bucknell, it can comply with all requirements of draft Policies S2.2 (although note S2.2.6 relates to impact on the River Clun SAC) and SP8, however draft Policy DP13 places significant obstacle in the way of its development. Every effort should be made by the Local Planning Authority (LPA) to bring it forward for development as quickly as possible.</p> <p>The site has also been allocated for development for 22 years, most recently in the SAMDev Plan (2015) for 70 dwellings. There have also been a number of Planning Applications on the site, the most recent remains undetermined. However, delivery has been delayed for numerous reasons but not willingness of the landowner.</p> <p>The SAMDev Plan states development in the Bishop's Castle area may "adversely affect the integrity of the River Clun SAC. Mitigation measures are required to remove harm arising from hydrological and water quality impacts on this internationally designated site ..... ", no readily available/understandable advice has been provided on what mitigation measures might be suggested and this remains unresolved. It also requires project level Habitats Regulations Assessment (HRA) for proposals where a likely significant effect on an internationally designated site may occur (the HRA was to be prepared by the LPA). It also specified proposals likely to have a significant effect on factors including priority species and priority habitats, would only be permitted "where it could be demonstrated that there is no satisfactory alternative means of avoiding such impacts and the social or economic benefits of the proposal outweigh the harm to the asset". No advice has ever been forthcoming from the LPA on the measures that might be regarded as mitigating effects on natural assets.</p> <p>A River Clun SAC Nutrient Management Plan (NMP) was prepared by Natural England (NE), the Environment Agency (EA) and the LPA, to identify those issues threatening the freshwater pearl mussels in the River Clun. It concluded the freshwater pearl mussel population was 'functionally extinct' (declining population and little evidence of recruitment), and estimated mussels would only survive for another 20 years if nothing was done. Therefore a series of targets for water quality in the River Clun should be adopted, although even if achieved, there was no guarantee the colony would be rejuvenated. Three main causes of problems for the mussels were phosphates, nitrates and silt, of which development was a major factor for only phosphate (majority associated with Waste Water Treatment Works (WWTW)). The NMP contained no specific actions a developer might take to make residential development acceptable. The LPA advised development cannot occur unless it demonstrates no phosphates generated would enter the River and it should also demonstrate betterment.</p> <p>Discharge from Bucknell WWTW into the River Clun is controlled by Severn Trent Water (STW) and the EA. In 2017, STW indicated they intended to solve the problem by diverting discharge to another watercourse. However, this did not occur, instead, STW installed additional phosphate stripping facilities. Understand this has improved water quality, but has not improved it to a level that would mean targets set in the NMP are achieved.</p> <p>Most recently, the LPA in association with NE have produced a document indicating that development will only be permitted which would involve discharge to the River Clun or its tributaries, if it can be shown that the development would be "nutrient neutral". There is no indication given as to how this could be measured, how it could be achieved, what effect it might have on the water quality in the River, or whether it would produce a situation where the pearl mussel colony might be rescued and rejuvenated.</p> <p>The Local Plan Review continues this situation. Bucknell is identified as a Community Hub and BUCK001 is reallocated, however is still constrained by the necessity to ensure that the freshwater pearl mussels in the River Clun are unharmed by the development. Draft Policy DP13 specifies the restrictions in the Clun catchment, but no advice is provided as to how identified objectives can be achieved. Clear that simply preventing development is not the answer, but very little appears to be happening that would help in other directions. One suggestion a refresh of the NMP, but these are clearly ineffective unless they include definitive/measurable actions on the part of those bodies responsible for water quality and comprise more than just preventing development.</p> <p>This situation effects more than just BUCK001. The River Clun catchment includes Bishop's Castle (Key Centre), Clun (Community hub) and Lydbury North (Community Cluster) amongst others. Allocations for residential development have not come forward due to the same problem. These allocations are to be saved and there is a clear need/demand for development, which continues to be recognised. As such, the draft Shropshire Local Plan should tackle the issue of the water quality in the River Clun in a pro-active manner, and bring forward positive proposals to be put into action by the various authorities that have responsibility for watercourses in the catchment in order that the development that is planned, wanted and needed can be delivered. Until the draft Shropshire Local Plan includes such proposals it cannot be regarded as being "sound" as it is not effective or been developed in a positive manner, fails to meet the responsibility of ensuring the survival of the pearl mussel colony and will also fail to deliver the dwellings (514) planned in the Clun catchment.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
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Understand this has improved water quality , but has not improved it to a level that would mean targets set in the NMP are achieved.</p> <p>Most recently, the LPA in association with NE have produced a document indicating that development will only be permitted which would involve discharge to the River Clun or its tributaries, if it can be shown that the development would be "nutrient neutral". There is no indication given as to how this could be measured, how it could be achieved, what effect it might have on the water quality in the River, or whether it would produce a situation where the pearl mussel colony might be rescued and rejuvenated.</p> <p>The Local Plan Review continues this situation. Bucknell is identified as a Community Hub and BUCK001 is reallocated, however is still constrained by the necessity to ensure that the freshwater pearl mussels in the River Clun are unharmed by the development. 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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0512	B003	<p>The draft Shropshire Local Plan should be modified to include specific, positive, measures that will:</p> <ul style="list-style-type: none"> <li>i. Ensure the longevity of the freshwater pearl colony, and</li> <li>ii. Ensure that the development that is assessed as being necessary in the River Clun catchment can be delivered immediately upon the adoption of the draft Shropshire Local Plan.</li> </ul>	<p>Shropshire Council must comply with the Habitats Regulations and subsequent legal judgments (including the Dutch Nitrogen case) when determining planning applications which are likely to have an adverse effect on the River Clun SAC. This means that development in the river Clun catchment can only be permitted if it can be demonstrated that no adverse effect on the River Clun SAC will occur. The Council is unable to consent to planning applications in Bucknell (and the wider river Clun catchment) which do not meet this requirement. Policy DP13 plans positively for development in the Clun catchment whilst safeguarding the SAC, by setting out the criteria which planning proposals must meet to comply with the Habitats Regulations. A series of minor modifications to this policy and its explanation (see schedule of minor modifications) are proposed to provide additional clarity on legal compliance with the Habitats Regulations and Dutch Nitrogen Judgement and on processes to support policy implementation, including the assessment of nutrient neutrality and determination of mitigation measures.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0512	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP13 (BUCK001)	Not Specified	No	Not Specified	<p>Support proposed allocation of BUCK001. This is an important brownfield site for Bucknell, it can comply with all requirements of draft Policies S2.2 (although note S2.2.6 relates to impact on the River Clun SAC) and SP8, however draft Policy DP13 places significant obstacle in the way of its development. Every effort should be made by the Local Planning Authority (LPA) to bring it forward for development as quickly as possible.</p> <p>The site has also been allocated for development for 22 years, most recently in the SAMDev Plan (2015) for 70 dwellings. There have also been a number of Planning Applications on the site, the most recent remains undetermined. However, delivery has been delayed for numerous reasons but not willingness of the landowner.</p> <p>The SAMDev Plan states development in the Bishop's Castle area may "adversely affect the integrity of the River Clun SAC. Mitigation measures are required to remove harm arising from hydrological and water quality impacts on this internationally designated site ..... ", no readily available/understandable advice has been provided on what mitigation measures might be suggested and this remains unresolved. It also requires project level Habitats Regulations Assessment (HRA) for proposals where a likely significant effect on an internationally designated site may occur (the HRA was to be prepared by the LPA). It also specified proposals likely to have a significant effect on factors including priority species and priority habitats, would only be permitted "where it could be demonstrated that there is no satisfactory alternative means of avoiding such impacts and the social or economic benefits of the proposal outweigh the harm to the asset". No advice has ever been forthcoming from the LPA on the measures that might be regarded as mitigating effects on natural assets.</p> <p>A River Clun SAC Nutrient Management Plan (NMP) was prepared by Natural England (NE), the Environment Agency (EA) and the LPA, to identify those issues threatening the freshwater pearl mussels in the River Clun. It concluded the freshwater pearl mussel population was 'functionally extinct' (declining population and little evidence of recruitment), and estimated mussels would only survive for another 20 years if nothing was done. Therefore a series of targets for water quality in the River Clun should be adopted, although even if achieved, there was no guarantee the colony would be rejuvenated. Three main causes of problems for the mussels were phosphates, nitrates and silt, of which development was a major factor for only phosphate (majority associated with Waste Water Treatment Works (WWTW)). The NMP contained no specific actions a developer might take to make residential development acceptable. The LPA advised development cannot occur unless it demonstrates no phosphates generated would enter the River and it should also demonstrate betterment.</p> <p>Discharge from Bucknell WWTW into the River Clun is controlled by Severn Trent Water (STW) and the EA. In 2017, STW indicated they intended to solve the problem by diverting discharge to another watercourse. However, this did not occur, instead, STW installed additional phosphate stripping facilities. Understand this has improved water quality, but has not improved it to a level that would mean targets set in the NMP are achieved.</p> <p>Most recently, the LPA in association with NE have produced a document indicating that development will only be permitted which would involve discharge to the River Clun or its tributaries, if it can be shown that the development would be "nutrient neutral". There is no indication given as to how this could be measured, how it could be achieved, what effect it might have on the water quality in the River, or whether it would produce a situation where the pearl mussel colony might be rescued and rejuvenated.</p> <p>The Local Plan Review continues this situation. Bucknell is identified as a Community Hub and BUCK001 is reallocated, however is still constrained by the necessity to ensure that the freshwater pearl mussels in the River Clun are unharmed by the development. Draft Policy DP13 specifies the restrictions in the Clun catchment, but no advice is provided as to how identified objectives can be achieved. Clear that simply preventing development is not the answer, but very little appears to be happening that would help in other directions. One suggestion a refresh of the NMP, but these are clearly ineffective unless they include definitive/measurable actions on the part of those bodies responsible for water quality and comprise more than just preventing development.</p> <p>This situation effects more than just BUCK001. The River Clun catchment includes Bishop's Castle (Key Centre), Clun (Community hub) and Lydbury North (Community Cluster) amongst others. Allocations for residential development have not come forward due to the same problem. These allocations are to be saved and there is a clear need/demand for development, which continues to be recognised. As such, the draft Shropshire Local Plan should tackle the issue of the water quality in the River Clun in a pro-active manner, and bring forward positive proposals to be put into action by the various authorities that have responsibility for watercourses in the catchment in order that the development that is planned, wanted and needed can be delivered. Until the draft Shropshire Local Plan includes such proposals it cannot be regarded as being "sound" as it is not effective or been developed in a positive manner, fails to meet the responsibility of ensuring the survival of the pearl mussel colony and will also fail to deliver the dwellings (514) planned in the Clun catchment.</p>
A0513	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13 (HKW014)	Not Specified	No	Not Specified	<p>Clear Shropshire Council does not intend to delivery of employment development of any conse-quence in the rural area. Indeed, draft Policy SP13.6.d says windfall Class B development will be supported where it is "for development of a suitable scale located within a Community Hub, Commu-nity Cluster or in the Countryside that satisfies Policies SP12, SP8, SP9 or SP10".</p> <p>Meanwhile, some 8,470 dwellings (27 .5% of the total new housing) will be accommodated in the rural area. Em-ployment provision to cater for this level of housing relies on windfall development, preferably on existing employment areas and certainly within specified village development boundaries.</p>
A0513	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 (HKW014)	Not Specified	No	Not Specified	<p>References to step change in provision of employment opportunities appear only likely to occur in areas that are already heavily developed.</p> <p>Consider requirements within draft Policy SP12.3 and SP12.4.f are unlikely to bring about the step change in economic activity aspired to by Shropshire Council. Appears Shropshire Council does not have concrete ideas about how these examples can bring about step change or even, for that matter, cater for the existing situation.</p> <p>Draft Policy SP12 has not been positively prepared and there is little evidence available in the draft Shropshire Local Plan that would suggest a positive direction of travel.</p> <p>Nevertheless, more houses are to be constructed in Hinstock, and more commuting will have to take place. This makes the draft Shropshire Local Plan 'unsound'. Draft Policy SP12 should be producing concrete proposals which will result in a greater variety of employment opportunities than exist at present.</p>

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A0512	B004	<p>The draft Shropshire Local Plan should be modified to include specific, positive, measures that will:</p> <p>i. Ensure the longevity of the freshwater pearl colony, and</p> <p>ii. Ensure that the development that is assessed as being necessary in the River Clun catchment can be delivered immediately upon the adoption of the draft Shropshire Local Plan.</p>	<p>Shropshire Council must comply with the Habitats Regulations and subsequent legal judgments (including the Dutch Nitrogen case) when determining planning applications which are likely to have an adverse effect on the River Clun SAC. This means that development in the river Clun catchment can only be permitted if it can be demonstrated that no adverse effect on the River Clun SAC will occur. The Council is unable to consent to planning applications in Bucknell (and the wider river Clun catchment) which do not meet this requirement. Policy DP13 plans positively for development in the Clun catchment whilst safeguarding the SAC, by setting out the criteria which planning proposals must meet to comply with the Habitats Regulations. A series of minor modifications to this policy and its explanation (see schedule of minor modifications) are proposed to provide additional clarity on legal compliance with the Habitats Regulations and Dutch Nitrogen Judgement and on processes to support policy implementation, including the assessment of nutrient neutrality and determination of mitigation measures.</p>	No
A0513	B001	<p>Draft Policy SP13 should be revised to indicate employment development, including on sites that may lie just outside the development boundaries of Community Hubs, will be considered seriously and planned development on such sites will be encouraged. Site HKW014 should be allocated for employment development (an identified on the Inset Map for Hinstock as such). Uses could include Class B, E, C2 and C2A and sui generis uses.</p>	<p>In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038.</p>	No
A0513	B002	<p>Draft Policy SP12 should be revised to indicate employment development, including on sites that may lie just outside the development boundaries of Community Hubs, will be considered seriously and planned development on such sites will be encouraged. Site HKW014 should be allocated for employment development (an identified on the Inset Map for Hinstock as such). Uses could include Class B, E, C2 and C2A and sui generis uses.</p>	<p>Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. It is considered that an employment land provision at Junction 3 of the M54 Motorway is not required during this Plan period to 2038. The employment policies SP12, SP13 and SP14 would still be sufficiently flexible to accommodate such an outcome in the event that the circumstances determining the strategy for the Local Plan were to change considerably during the Plan period</p>	No



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A0513	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11.2 (HKW014)	Not Specified	No	Not Specified	Hinstock has long been recognised as a village to which other smaller settlements look for services and facilities. As such is identified as a Community Hub in the adopted Local Plan (residential guideline of 60) and proposed to be a Community Hub in the draft Shropshire Local Plan (residential guideline of 155). Hinstock has clearly been growing and offers a good range of services and facilities, however it has few employment opportunities and no provision has been made for employment within the last two iterations of the Local Plan for the area. Despite an increase in the amount of dwellings proposed, there remains no planned provision for employment development. Draft Policy S11.2.3 states "new employment development will be delivered through appropriate small-scale windfall development within the settlements development boundary". Clearly no consideration has been given to provision of employment in or on the edge of settlements and sites within the development boundary are likely to be resisted by nearby residents. The draft Shropshire Local Plan and the he Plan for the Market Drayton Place Plan leaves provision of employment to chance with no coherent policy guidance, creating commuter settlements (conflicting with draft Policies which seek to improve sustainability, reduce pollution and reduce private car travel) and as such is not positively prepared or sound. Site HKW014 could provide a small employment develop-ment. It is accessible to Telford, Wolverhampton and Market Drayton via the A41 (without travelling through the village), is well screened and there are few residential properties in the immediate vicinity.
A0514	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002/P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0514	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0514	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.

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A0513	B003	Draft Policy S11.2 should be revised to indicate employment development, including on sites that may lie just outside the development boundaries of Community Hubs, will be considered seriously and planned development on such sites will be encouraged. Site HKW014 should be allocated for employment development (an identified on the Inset Map for Hinstock as such). Uses could include Class B, E, C2 and C2A and sui generis uses.	Shropshire Council considers that the proposed development strategy for Market Drayton and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0514	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0514	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0514	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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A0514	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0515	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1i (WHT037 & WHT044)	Yes	No	Yes	Support proposed allocation of WHT037 and WHT044 for residential development. The site is available, deliverable and will come forward for development, at the first opportunity (site investigations have been undertaken, including ground investigation tests, arboriculture surveys, ecology, highways and drainage assessments in readiness for a full Planning Application in 2021). Promoter has a track record of delivery. The site forms a logical extension to the now completed WHIT046 site and will make a positive contribution to meeting the identified housing need for Whitchurch. However, consider the draft Shropshire Local Plan is unsound as site capacities are expressed in terms of 'Provision' (in the case of WHT037 and WHT044, 200 dwellings). Consider this should be expressed as a minimum, otherwise it has the potential to jeopardise housing delivery (and meeting housing need) and there is a realistic possibility that allocated sites could be developed at low densities which would not represent effective use of land. As currently expressed, the draft Policy is considered contrary to section 11 (paras 117 and 122) of the National Planning Policy Framework (NPPF) on making effective use of land. WHT037 and WHT044 has capacity to accommodate more than 200 dwellings, whilst complying with other Local Plan policies such as open space provision, sustainable drainage and habitat enhancement. As such, the provision should be a minimum of 200 dwellings, to ensure efficient use of land and maximise the prospect that the objectively assessed housing need will be met.
A0516	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	Yes	No	Yes	Consider the criterion and reference to infill sites of less than 0.1hectares and up to a maximum of 3 dwellings to be too prescriptive. It is likely that such restrictions may not provide sufficient scope for meeting local housing needs or enough opportunity sites to genuinely sustain rural communities in accordance with the policy objective expressed in paragraph 3.23. Moreover, Community clusters are typically ‘villages’ characterised by a variety of settlement forms – some compact, some linear and some dispersed. For this reason, the reference to infill sites is likely preclude many candidate sites. Greater weight should be given to such issues as sustainability, connection to services, footpaths and avoidance of flood risk.
A0517	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP4	Not Specified	No	Not Specified	The explanation text to DP4 (paragraph 4.60) says that there is an expectation that exception sites will not exceed 25 dwellings. The policy wording itself needs to say the same rather than leave it open to debate. Paragraph 16 of the NPPF says plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. DP4 is not clear and therefore is not sound because it is not consistent with national policy. Exception sites are supposed to be just that, an exception. If you let them be any size then they should be defined in the local plan as specific allocations. 25 is a reasonable number under this policy, and as the plan thinks this is the right amount, it needs to be enshrined in the actual policy.
A0517	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP7	Not Specified	No	Not Specified	Part (e) of DP7 says the scale of the development will solely be dictated by the evidence of local affordable housing need but will not normally exceed 10 dwellings. Paragraph 16 of the NPPF says plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. DP7(e) is not unambiguous because in theory it could be any number above 10 and therefore is not sound because it is not consistent with national policy.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0514	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0515	B001	Modify column 3 of Schedule S18.1(i) (Provision) to read minimum level of provision, 200 dwellings. The principle of a minimum level of provision ought to be applied to WHT037 and WHY044 and all residential allocations identified in the draft Shropshire Local Plan.	Noted. Para 6 of Draft Policy S18.1 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage. With regard to the efficient use of land, Shropshire Council would note that draft Policies SP1 and SP5 specify development should make efficient use of land. Furthermore draft Policy DP1 specifies a residential mix for sites of 5 or more dwellings which will contribute to ensuring efficient use of land. Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0516	B001	Modify Policy SP9.2.c to refer to sites capable of accommodating between 5-10 dwellings. The reference to a maximum of 3 dwellings is far too restrictive and would preclude, for example, a courtyard scheme, which may be far more appropriate in some rural location than 3 detached dwellings, a more likely outcome, as worded in the Policy. Policy SP9. 2.c ought to be modified in order that sites can come forward for consideration that will genuinely sustain rural communities in accordance with Policy SP9. As written Policy SP9.2.c is unsound. It is in conflict with the Council's Strategic Approach to ensuring sustainable development as expressed in Policy SP2 and with paragraph 3.23 of the Regulation 19 Draft Local Plan. It allows for appropriate levels of development within rural areas, to enhance the longer-term sustainability of rural communities. This includes Community Clusters described as "...settlements with aspirations to enhance their sustainability..... the focus for rural development". This aspiration can be achieved by modifying Policy SP9.2.c as proposed. As written Policy SP9.2.c is in conflict with NPPF paragraph 77 and 78 which identifies that Local plans should identify opportunities to for villages to grow and thrive especially where this will support local services.	Noted. It is considered that the definition of infill plots provided within draft Policy SP9 is appropriate. It provides a level of certainty to local communities and the development industry about the types of sites that are suitable for such development - in terms of location, size and capacity; ensures an effective use of land; but also allows for flexibility to density, design and layout, as the referenced site size (0.1ha or less) and capacity (maximum 3 dwellings) are maximums. As such it recognises the diverse nature of Community Clusters and the settlements within them.	No
A0517	B001	DP4 should be revised to state that exception sites should be a maximum of 25 dwellings.	Noted. Shropshire Council considers that it is appropriate to include the general expectation of the maximum size of exception sites within the proposed explanation to draft Policy DP4. It is also considered appropriate to recognise that exceptional circumstances will exist that justify larger sites within the proposed explanation to draft Policy DP4.	No
A0517	B002	DP7(e) needs to be more precise and there should be no room for ambiguity. The words "not normally" should therefore be deleted from the policy.	Noted. Shropshire Council consider requirements identified within draft Policy DP7 are appropriate reflecting National Policy and the wide range of situations where cross subsidy housing may be delivered. An updated Type and Affordability of Housing Supplementary Planning Document also provides an opportunity to provide further context.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0517	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1	Yes	Yes	Yes	Support the sites allocated for development on the Policies Map for Whitchurch - WHT014, WHT037, WHT042 and WHT044; and those saved and continued from the SAMDev.
A0517	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 WHT014	Not Specified	Yes	Not Specified	This site continues the new housing that has been built in this part of town. Like WHT037 and WHT044 it is very well situated for the town centre. It makes perfect sense to continue to build houses on Liverpool Road. WHT014 is far more sustainable, both in terms of access to services and shops, and has less impact on things like roads and landscape than alternative options. The Council is correct to allocate WHT014 and I support it.
A0517	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 WHT037 / 044	Not Specified	Yes	Not Specified	These sites will continue the successful housing development that has already taken place around them. They are very well located and genuinely within walking distance of the town centre, including Sainsbury's which is only a few minutes away. I therefore support their allocation.
A0517	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 WHT042	Not Specified	Yes	Not Specified	This site is very well located by the railway station and to the jobs around Waymills. This combination delivers sustainable development. Both the station and industrial estate are walkable, as is the town centre along Station Road into Green End. This site is far superior to other options that the Council has quite correctly rejected for failing to deliver sustainable development. I therefore support its allocation.
A0517	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	There is no geographical aspect to the location of the Black Country related development and it will simply be spread around Shropshire. Therefore, by way of example, Weston Rhyn in the top north west corner of the county will be delivering some of Dudley's housing. Much of the north west, west and north east of Shropshire has no real relationship with the Black Country. These areas have a relationship more with North East Wales, the North West and the Potteries. I am not aware of any real direct public transport links from these locations to the Black Country and therefore nothing to discourage car use if these locations should be expected to provide housing and jobs for the conurbation. The 1,500 dwellings and 30 hectares of employment are not for Shropshire, they are for the Black Country. It would therefore be expected that those who will live and work in these new homes and business will be current Black Country residents. It is implausible to think that the same people decanted to Shropshire to live will be the same people who take up jobs on the 30 hectares of employment and what will actually happen is the new residents will commute back into the conurbation, and those working in Shropshire will travel out of the conurbation. The result therefore of dispersing Black Country development around Shropshire will be unsustainable travel patterns. The way the Black Country development is dealt with is neither positively prepared nor justified. It is not achieving sustainable development or an appropriate strategy. What should be happening is for the focus of any Black Country development to be on the eastern edge of Shropshire between Telford and Wyre Forest District, and on the M54/A5/Rail transport corridor to Shrewsbury.
A0518	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Trefonen	Not Specified	No	Not Specified	Trefonen does not have significant employment opportunities or peak time public transport, and is the only hub without these. The Plan is therefore unsound
A0518	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	The HoS is flawed - the added text "a larger range of services" isn't defined and adds an element of subjectivity.
A0519	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0519	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0517	B003	n/a	Noted.	No
A0517	B004	n/a	Noted.	No
A0517	B005	n/a	Noted.	No
A0517	B006	n/a	Noted.	No
A0517	B007	<p>The 1,500 dwellings and 30 hectares of employment land being provided for the Black Country should be redirected to the eastern edge of Shropshire and the M54/A5/Rail transport corridor to Shrewsbury.</p> <p>The housing and employment numbers for these relevant areas should be increased. At the same time the numbers for the north west, north and north east of Shropshire including Oswestry, Whitchurch and Market Drayton (and their Place Plan Areas) should be reduced to reflect this re-distribution.</p> <p>The local plan would then have the appropriate strategy to achieve sustainable development in relation to this matter.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p>	No
A0518	B001	Trefonen should not be a Hub and should not have a housing guideline. It should be a rural settlement	Shropshire Council undertook a robust assessment during the Hierarchy of Settlement process and Trefonen's services and facilities meant that its score resulted in it being a Hub. Notably there are no housing allocations in the settlement as part of this Plan Review. A minor modification is proposed to reduce the gross housing requirement for the village over the plan period (see response to A0605)	No
A0518	B002	The HoS must be amended, supporting the Spatial Vision, SP1 and SP3. Remove text relating to a larger range of services and facilities.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire.</p>	No
A0519	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0519	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0519	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0519	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0519	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0520	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2	No	No	No	'Gunning principles' for public consultation include ensuring "adequate time for consideration and response" and there is a common law requirement for responses to be conscientiously taken into account. Consultation has not taken into account restrictions on public involvement due to Covid 19 restrictions (exacerbated by demographics of Shropshire which mean many do not have access to the internet or appropriate resources) and is therefore contrary to government guidelines and flawed. Evidence for non-compliance of consultation includes CPRE comments on the draft Statement of Community Involvement (summarised within the representation). The consultation process is complex, but no assistance/explanation is provided. The inspector needs to evaluate how and if Shropshire Council processed/evaluated responses to previous consultations. Many consider the consultation process was inappropriate and unfair. How can 500 responses to previous consultations be ignored. Objections from CPRE should be considered.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0519	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0519	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0519	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0520	B001	The Inspector should evaluate the consultation process (particularly during Covid 19) and responses to consultation from Cressage residents. Objections from CPRE should be considered.	Noted. Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation. Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan. It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0520	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 (CES006)	Yes	No	No	Unclear how many dwellings will be allowed on CES006. It states 4 in one place and in another specifies the potential for the conversion of the former Eagles into 2 dwellings and up to 3 new dwellings. Strong local interest in a community project to use part of the original downstairs of the former Eagles (recently a listed building) as a community asset/café/farm shop, this has not been logged. Would seem a sensible and valuable project for an area with so few amenities, even without further development.
A0520	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2(1) (CES005)	Yes	No	No	The status of Cressage as a Community Hubs needs to be proved. Should Community Hub status be approved, with regard to CES005: -It is unclear how many houses are proposed (numbers have varied from 60 to 80 dwellings). -Consider the proposed access is extremely dangerous. Many vehicles (especially lorries and HGVs) speed on the hill south of the village. -Traffic calming (lights or roundabout) would be required to prevent injury to pedestrians and drivers. -Crossing the A458 to access services (shop, school, bus stop, surgery etc) could be very dangerous for pedestrians (particularly for children and disabled). -Access to Wood Lane would be very difficult due to the gradient and existing housing (including a listed building). -The site has been subject to flooding, this should be considered. -Talk of a 'Special Interest Woodland Site' down Wood Lane. Site assessments are unclear and reasoning is woolly.
A0520	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.4	No	No	No	In para 5.184 of the explanation to draft Policy S13.2, 5.184. Cressage is presented as the only Community Hub in the Much Wenlock Place Plan Area and appears in documentation to have changed its status from being a 'Countryside' settlement since 2015. Why and how has the status changed from Countryside to Community Hub as it does not meet the criteria for allocation as a Community Hub? This was strongly expressed to the Council after the consultation (lack of post office, no operating church, rudimentary bus service, minimal mobile library visits, loss of public house/meals outlet, no pharmacy etc) Noted that services and amenities have reduced steadily concomitantly with major 1970's housing development onwards. Objections from CPRE should be considered.
A0521	B001	Sustainability Appraisal	BKL001	Not Specified	No	Not Specified	Stage 2b of the site assessment incorrectly describes BKL001 as gently undulating, it is to all intents and purposes flat. Stage 3 of the site assessment incorrectly assesses BKL001 with regard to surface flood risk (recently incidents of heavy rain formed ponds on site). It also describes access as via a lane, it is actually via Chapel Lawn Road. Dispute final sentence of the recommendation in the Stage 3 site assessment, regarding walking to services. Children walk to school from Ladywell without complaint, consider residents of BKL001 would walk easily to the services to the east.
A0521	B002	Sustainability Appraisal	BKL002	Not Specified	No	Not Specified	Stage 2b of the site assessment for BKL002 includes a typo should be by rather than buy. With regard to Stage 3 of the site assessment for BKL002, recent events resulted in significant flooding of the site. With regard to the recommendation within stage 3 of the site assessment, consider reference to 'gateway into the village' is irrelevant; reference to consolidation of current open form is incorrect as it would take away from this; and the final sentence is wrong as services are to the east rather than west.
A0521	B003	Sustainability Appraisal	BKL004	No	No	Not Specified	In the Stage 3 of the site assessment recommendation for BKL004, it incorrectly references the site as BKL002. Also consider reference to consolidation of current open form is incorrect as it would take away from this; and the final sentence is wrong as services are to the east rather than west.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0520	B002	Clarify the number of dwellings proposed on CES006. Consider use of part of the former Eagles as a local amenity/community use as part of any development.	Noted. Shropshire Council considers that the approximate site capacity specified for site CES006 (around 4 houses) is appropriate. This capacity is considered likely to consist of either 1 resulting from the conversion of the existing building and 3 within the wider site or 2 resulting from the conversion of the existing building and 2 within the wider site, dependent on the nature of development undertaken.	No
A0520	B003	Review points scoring within the Hierarchy of Settlements for Cressage and proposals for it to be a Community Hub. If Cressage remains a proposed Community Hub, review safety of the access to CES005. Examine soundness of site selection.	Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the development strategy proposed for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable. Proposed allocations have been informed by a proportionate and robust site assessment process.	No
A0520	B004	The Inspector should evaluate the consultation process (particularly during Covid 19) and responses to consultation from Cressage residents. Review points scoring within the Hierarchy of Settlements for Cressage and proposals for it to be a Community Hub (the assessment at the least might be arbitrary). Cressage should be identified as countryside (This does not equate to a 'no build' stance, but to a 'controlled build' scenario with proper sound objectives underpinned by agreed assessment of need and democratic discussion). A housing need assessment should be undertaken for Cressage before consideration of Community Hub status and major development. Consider more limited and organic development rather than a sudden big influx of commercial development would more adequately/satisfactorily contribute to sustainability, climate change and affordable housing. Objections from CPRE should be considered.	Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub. Shropshire Council also consider that the development strategy proposed for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.	No
A0521	B001	Review, correct and store/save corrected version of the Sustainability Appraisal. Resubmission not considered necessary in this case.	The Council considers that its Sustainability Appraisal and Site Assessment process is accurate. Flood risk in the SA, including surface water flooding is based on the Council's SFRA which is considered to be accurate and up to date. No change proposed.	No
A0521	B002	Review, correct and store/save corrected version of the Sustainability Appraisal.	Comments noted. Proposed changes to SA would have no material effect so are not considered necessary.	No
A0521	B003	Review, correct and store/save corrected version of the Sustainability Appraisal.	Proposed changes to SA would have no material effect so are not considered necessary.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0521	B004	Sustainability Appraisal	BKL008	Not Specified	No	No	<p>Stage 2b of the site assessment for BKL008 makes no reference to the adjacent Shropshire Hills AONB within the surrounding character.</p> <p>Note that Stage 3 site assessments for other sites make much play of how development will affect views from/of the AONB. This should be the same for BKL008.</p> <p>In stage 3 of the site assessment, with regard to surface water flood risk, BKL008 regularly becomes waterlogged and it the natural drainage 'sponge' from the AONB to Redlake valley.</p> <p>In the strategic considerations of stage 3 of the site assessment, consider highway issues are under-represented for BKL008. The same issues identified for BKL010 exist for BKL008.</p> <p>In the recommendation of stage 3 of the site assessment, consider reasoning for BKL008 is poor with regard to:</p> <ul style="list-style-type: none"> <li>-Proximity to key services - BKL008 would represent a maximum of an additional 100m and would be negated by reasoning that development should provide footways linking to the existing village network although a footway into the Redlake Meadow development would address this matter.</li> <li>-Suggestion the development will over-house Bucknell, yet assessment of BKL008a recognises the parcel must facilitate development of the remaining land at some future time. Village's view has been strongly expressed - it is firmly opposed to development of BKL008. Not opposed to development per se, it is just this greenfield site, with the deleterious effect on the AONB, the difficult access to B4367, surface water flooding, the blot on essential agricultural land and small developments, that they are opposed to. The village feels especially aggrieved this site is even considered when there is a brownfield site crying out for development.</li> </ul>
A0521	B005	Sustainability Appraisal	S2.2 BKL008a	Not Specified	No	No	<p>Stage 2a of the site assessment for BKL008a incorrectly assesses the site as within proximity of a playground, there is none as per BKL008.</p> <p>Stage 2b of the site assessment for BKL008a makes no reference to the adjacent Shropshire Hills AONB within the surrounding character.</p> <p>In stage 3 of the site assessment for BKL008a:</p> <ul style="list-style-type: none"> <li>-Note Stage 3 site assessments for other sites make much play of how development will affect views from/of the AONB. This should be the same for BKL008.</li> <li>-With regard to surface water flood risk, the site regularly becomes waterlogged and it the natural drainage 'sponge' from the AONB to Redlake valley.</li> <li>-Consider highway issues are under-represented for BKL008a. The same issues identified for BKL010 exist for BKL008a.</li> <li>-Tree comments regarding large visibility splay and 'hedge stepping stones' highlight complexity of access.</li> </ul> <p>In the strategic considerations of stage 3 of the site assessment:</p> <ul style="list-style-type: none"> <li>-Consider highway issues are misleading and have not been given sufficient weight in assessing for BKL008a. The same issues identified for BKL010 exist for BKL008a, whether approached from north or south, will introduce a dangerous junction bringing significant additional traffic into an already busy and potentially dangerous section of roadway.</li> <li>-Worse is the additional building to allow for development of the remainder of BKL008 in due course. Additionally, there will be increased pedestrian issues – walkers, families with buggies and mobility scooters. These issues have received only a cursory reference.</li> <li>-Reference is made in the final sentence to a footpath link to Redlake Meadow, this would involve a path through the element of BKL008 excluded from BKL008a, which will either continue as grazing land or need to be otherwise suitably maintained.</li> </ul>
A0521	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2 BKL008a	Not Specified	No	No	<p>Consider the draft Shropshire Local Plan is unsound as:</p> <p>It is unclear how the proposed housing guideline for Bucknell has been arrived at. Unsound to propose to increase development in Bucknell (up to 110 dwellings) when the October 2019 'Right Homes, Right Place' survey revealed just 14 respondents looking to move in the next 5 years (proposals are 8 times the 5 year demand).</p> <p>Unsound to encourage construction of 110 dwellings in Bucknell when 500 are planned at Craven Arms (within 7 miles) where there will be employment 'on the doorstep', and developments proposed at Bishops Castle (150) and Ludlow (1000).</p> <p>Plan to build on a greenfield site (BKL008a) because it allows quick delivery when there is a brownfield site in the village with many years' capacity, is unsound and contrary to SC's 'Brownfield First' policy. Also disingenuous and unsound to promote a greenfield site for quick delivery when it is allocated to the 'Long Term 2035/36-2037/38' window.</p> <p>Parish Council indicated in response to Regulation 18 consultations they are prepared to accept substantial development, but not at the unjustified expense of important agricultural greenfield, especially immediately adjacent to the Shropshire Hills AONB. However, despite repeatedly raising rational concerns regarding BKL008a (not preferred by residents) it remains a proposed allocation so there has been no substantive cooperation from Shropshire Council.</p> <p>Draft site guidelines for proposed allocation BKL008a in terms of contribution to historic character of the settlement, enhancement of the AONB and contributions to the countryside setting to the east are laughable and unachievable on the site.</p> <p>BUCK001 should be redeveloped and development kept out of site of the AONB if the Council truly want to protect the historic character of the settlement and enhance the AONB.</p>
A0521	B007	Sustainability Appraisal	BKL009	No	Not Specified	Not Specified	<p>Within stage 2b of the site assessment, BKL009 should be described as Land south of Chapel Lawn Road at junction with Daffodil Lane, Bucknell.</p>
A0521	B008	Sustainability Appraisal	BKL010	No	No	Not Specified	<p>Stage 2b of the site assessment incorrectly describes BKL010 as gently undulating, it is in fact steeply sloped. Also no reference is made to the site lying entirely within the Shropshire Hills AONB.</p> <p>The description of the site in Stage 3 of the site assessment relates to a different site.</p> <p>In stage 3 of the site assessment, surface flood risk is incorrect at 0%, the site becomes very wet.</p>
A0521	B009	Sustainability Appraisal	BKL011	No	No	Not Specified	<p>Stage 2b of the site assessment indicates the site is 50% brownfield, consider it is actually 70%. Furthermore, the indicative dwelling capacity is some 34, yet it is programmed for at least 70.</p> <p>In stage 3 of the Site Assessment there is a type under the heritage – management of constraints: Delete 'good shed' Insert 'goods shed'. The strategic considerations description provided is not of this site.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0521	B004	<p>Insert reference to AONB being directly opposite to and overlooking BKL008 and note the impact any development on the site will have on the AONB. Reassess Visual Impact to 'High'.</p> <p>Review and increase Surface Water Flood Risk percentages.</p> <p>Include the traffic and pedestrian arguments used against BKL010 within the assessment of BKL008 and re-evaluate to further 'down-assess' the site.</p> <p>In the recommendations for BKL008 make a cogent case for pedestrian access.</p> <p>Ensure no greenfield sites are developed before the brownfield site development commences.</p>	<p>Comments noted. Proposed changes to SA would have no material effect so are not considered necessary.</p>	No
A0521	B005	<p>Re-assess BKL008a with regard to proximity to a playground.</p> <p>Insert reference to AONB being directly opposite to and overlooking BKL008a and note the impact any development on the site will have on the AONB. Reassess Visual Impact to 'High'.</p> <p>Review and increase Surface Water Flood Risk percentages.</p> <p>Include the traffic and pedestrian arguments used against BKL010 within the assessment of BKL008a and re-evaluate the site.</p> <p>Re-assess issues around the splay/access and reflect in the site's overall rating.</p> <p>Redraft to reflect:</p> <ul style="list-style-type: none"> <li>-The highlighted traffic control issues.</li> <li>-Note particularly the pedestrian/buggy/mobility scooter aspects.</li> <li>-Address the footpath issue through southern section of BKL008.</li> <li>-Amend overall site assessment to reflect the complications and linked increased risks.</li> </ul>	<p>Correction could be made to SA matrix for BKL008a</p> <p>Comments noted. Proposed changes to SA would have no material effect so are not considered necessary. The Council considers that the SA and site assessment process complies with the Environmental Assessment of Plans and Programmes Regulations 2004 and is a robust, proportionate and fair way of evaluating sites</p>	No
A0521	B006	<p>Review Bucknell's proposed housing guideline collaboratively and provide a reasoned rationale for the proposed allocation.</p> <p>Actively support options for BUCK001 (incorporating BKL011) to allow it to be developed as a mixed site as flexibly and creatively as possible allowing for alternative employment and housing possibilities in addition to previous assumptions – including possibility of extending the site eastwards.</p> <p>Undertake to allow no greenfield sites to be promoted until it is clear that market demand would justify such action.</p>	<p>Bucknell is appropriately designated as a Community Hub on the size of the settlement and the services and facilities it provides. Shropshire Council considers that the proposed development strategy for Bucknell and the existing and proposed allocations which contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Proposed site allocations have been informed by a proportionate and robust site assessment process. The settlement strategy for Bucknell, which is clearly explained in the Draft Local Plan, was consistently presented in consultations during its preparation. New housing allocation BKL008a for 20 dwellings was identified in the Preferred Sites consultation in 2018 and presented in subsequent consultations. Site BKL008a will supplement the saved SAMDev brownfield housing and employment allocation at BUCK001/BKL011 which already forms part of the housing land supply in Bucknell. The Council considered local representations recommending a further extension to BUCK001 but this site was extended to 70 dwellings in the SAMDev Plan and a further extension may affect its viability in the village of Bucknell. Further site options in Bucknell are influenced by the Area of Outstanding Natural Beauty and the Bucknell Conservation Area that cover the centre and west of the village. Site BKL008a on the east of the village lies beyond these two protective designations and provides an appropriate location for further modest housing development to meet a revised housing requirement for 110 dwellings which represents a modest increase from the previous figure of 100 dwellings. The delivery of BUCK001 and BKL008a is currently affected by the protection of the River Clun Special Area of Conservation (SAC) due to the water quality in the river. Site BKL008a could be delivered quickly as a smaller, greenfield allocation to refresh the housing market when the issues connected with the protection of the SAC are resolved but currently these issues will defer the delivery of new housing in Bucknell.</p>	No
A0521	B007	<p>Correct address, update and store as necessary.</p>	<p>The suggested amendment would have no material effect and so is not considered necessary.</p>	No
A0521	B008	<p>Provide correct description of the site – including significant AONB issue.</p> <p>Re-assess surface water flood risk.</p>	<p>Comments noted. Proposed changes to SA would have no material effect so are not considered necessary.</p> <p>Additionally, the Council considers that the SA and site assessment process complies with the Environmental Assessment of Plans and Programmes Regulations 2004 and is a robust, proportionate and fair way of evaluating sites</p>	No
A0521	B009	<p>Review, correct and update as necessary the Sustainability Appraisal.</p> <p>In view of this serious error linked to this key site, it is suggested that the consultation period should be restarted, to allow for submission by Shropshire Council of the correct description and assessment of this site and the subsequent review by consultees.</p>	<p>Comments noted. Proposed changes to SA would have no material effect so are not considered necessary.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0521	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP13	Not Specified	No	No	Proposals for significant pockets of development (totalling over 500 dwellings) within the River Clun catchment is patently unsound, given lack of any commitment within draft Policy DP13 as to how goals of nutrient neutrality/betterment shall be achieved. Without such a commitment, development proposals are, un-cooperatively, being set up to fail, developers are wasting money and residents' lives are being needlessly upset. Shropshire Council's 'Development within the River Clun Catchment: Guidance Note 12 (Revision A) February 2020' charts a way forward via production of a revised nutrient management plan (at para 2.5 of the Note), which 'must be produced' but draft Policy DP13 includes no commitment to carrying out that work – the key to unlock the Gaudian knot of Clun SAC development. There is a mis-match between draft Policy DP13 and the above mentioned Guidance Note as to the standards to be achieved: one refers to 'neutrality' the other to 'reduction'.
A0521	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 4.136	Not Specified	No	No	Proposals for significant pockets of development (totalling over 500 dwellings) within the River Clun catchment is patently unsound, given lack of any commitment within draft Policy DP13 as to how goals of nutrient neutrality/betterment shall be achieved. Without such a commitment, development proposals are, un-cooperatively, being set up to fail, developers are wasting money and residents' lives are being needlessly upset. Shropshire Council's 'Development within the River Clun Catchment: Guidance Note 12 (Revision A) February 2020' charts a way forward via production of a revised nutrient management plan (at para 2.5 of the Note), which 'must be produced' but draft Policy DP13 includes no commitment to carrying out that work – the key to unlock the Gaudian knot of Clun SAC development.
A0521	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 5.35	Not Specified	No	Not Specified	The final sentence of para 5.35 of the explanation to draft Policy S2.2 under-values Bucknell's railway connections.
A0521	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 5.36	Not Specified	No	Not Specified	The geographic description of the AONB's relationship with Bucknell is incorrect in para 5.36 of the explanation to draft Policy S2.2.
A0521	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 5.37	Not Specified	No	No	The brownfield/eyesore sites BUCK001 / BKL011 are and have remained for upwards of 30 years, Bucknell's preferred development site, as strongly and regularly expressed by the community. Siting Bucknell's development at this location will respect the historic character of the village, replacing redundant buildings with a mixed gateway development – with easy access to village facilities east and west as well as to B4367 and A4113. The site's topography, along with its established hedges and trees, mean development will be characterful and benefit from mature screening, ensuring no impact on the AONB. If increased numbers are required the site can expand eastward. Ring-fencing development to this site (extended if necessary) would demonstrate Shropshire's duty to cooperate and its commitment to the county's improvement as Bucknell looks to develop as a Community Hub.
A0521	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 5.38	Not Specified	No	Not Specified	BKL008a's relationship with the AONB is described wrongly. Proposed extension of the village eastwards will not move development away from the AONB.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0521	B010	Add the following additional para to draft Policy DP13: "Recognising the urgent need to improve and guarantee water quality as key to the Freshwater Mussels' viability – and thence for the proposed growth in housing, businesses and employment in the river Clun catchment – the Planning Authority, in association with statutory agencies and other stakeholders, will, as a priority, produce a revised nutrient management plan (NMP)."	The Council has proposed minor modifications to Policy DP13 in response to comments received from the Environment Agency and Natural England. These address the production of a River Clun SAC Restoration Plan.	No
A0521	B011	Revise para 4.136 of the explanation to draft Policy DP13 to state "Notwithstanding these improvements, the Habitat Regulations Assessment (HRA) for this Plan (in the light of the 'Dutch Nitrogen Case') shows that much development in the river Clun catchment is likely to have an adverse effect on the river Clun SAC. The urgent need for practical mitigation measures, which would remove this effect for larger applications, have yet to be proposed. Accordingly, to comply with the requirements of the Conservation of Habitats and Species Regulations 2017, this policy currently restricts development to that which is either nutrient neutral in terms of its effect on the SAC or results in a betterment. This is in anticipation of measures to achieve either of these criteria being found in the future for the majority of development in the catchment. Such measures will include work to produce a revised Nutrient Management Plan in association with statutory agencies and other stakeholders. The revised NMP, along with a robust Mitigation Action Plan, will provide the level of certainty required by the Habitats Regulations that the SAC restoration targets can be achieved in an appropriate timescale. These actions will additionally clarify the standards to be achieved by developers encouraged within this Plan to bring forward schemes in the SAC, but currently frustrated in their wish to unlock economic and housing development."	The Council has proposed minor modifications to Policy DP13 in response to comments received from the Environment Agency and Natural England. These address the production of a River Clun SAC Restoration Plan.	No
A0521	B012	Redraft the final sentence of para 5.35 of the explanation to draft Policy S2.2 as follows: "Bucknell's significance is also enhanced by its operational rail station, linking with the main line to Manchester, Birmingham and Cardiff and, via Knighton, to Swansea."	For clarity it is proposed to modify the final sentence of paragraph 5.35 of the policy statement for Bucknell to read: "Bucknell's significance is also enhanced by its operational rail station, linking with the main line to Manchester, Birmingham and Cardiff at Craven Arms and, via Knighton in Powys with stations to Swansea."	Yes
A0521	B013	Redraft para 5.36 of the explanation to draft Policy S2.2 as follows: "The provision of land for development in Bucknell is affected by the centre, north and west of the village being within ...."	For clarity it is proposed to modify part of paragraph 5.36 of the policy statement for Bucknell to read: "The provision of land for development in Bucknell is affected by the centre, <b>north</b> and west of the village being within ...."	Yes
A0521	B014	Redraft para 5.37 of the explanation to draft Policy S2.2 so after "...at the southern edge of the village." the following additional sentence is included: "The village is keenly supportive of moves to clear and redevelop this eyesore site (incorporating BKL011) as a gateway addition to the village, melding into the topography of the site, avoiding any impact on the AONB and if necessary extending eastward to accept the requirement for any additional housing capacity."	Site BKL008a will supplement the saved SAMDev brownfield housing and employment allocation at BUCK001/BKL011 which already forms part of the housing land supply in Bucknell. The Council considered local representations recommending a further extension to BUCK001 but this site was extended to 70 dwellings in the SAMDev Plan and a further extension may affect its viability in the village of Bucknell. For the purposes of clarity add the following text to paragraph 5.37 after the words "...at the southern edge of the village." to read "The village community has expressed its support for the proposal to clear and redevelop site BUCK001 as a gateway addition to the village, melding into the topography of the site and avoiding any impacts on the AONB."	Yes
A0521	B015	Redraft the first sentence of para 5.38 of the explanation to draft Policy S2.2 as follows: "The strategy for Bucknell is to meet the needs of the local communities, whilst recognising its landscape and historic significance, by extending the village to the east into countryside. This will move development away from the Conservation Area. It will however place additional development adjacent to the AONB, which lies directly to the north of the B4367."	The development of proposed housing allocation BKL008a from its road frontage with the B4367 will be oriented in a southerly direction into this larger parcel of land and towards the River Redlake to the south. The orientation of this development will move the new housing away from the AONB located to the north of B4367 and will help to lessen the impacts of this development on the adjacent AONB. For the purposes of clarity amend the first sentence of paragraph 5.37 to read "The strategy for Bucknell is to meet the needs of the local communities whilst recognising its landscape and historic significance by extending the village onto site BKL008a into the countryside to the east away from the Conservation Area and developing this site to the south of the B4367 away from the AONB."	Yes



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0522	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1	No	No	Not Specified	<p>Proposed site guidelines for site SHR173 include recognition that it is directly dependent on construction of the North West Relief Road (NWRR) and planning permission will not be entertained until a Masterplan is approved for the site. Given this, consideration must be given as to whether the site is deliverable within the proposed Plan period, as necessary processes (such as planning permission for the NWRR, preparing business cases for its approval, associated compulsory purchases, contracting and constructing the road and subsequent design and approval of SHR173). A series of scenarios for timescales for development of the site have been prepared (scenarios and an explanation of them is appended to the representation and informed by a guide on how quickly large scale housing sites deliver - also appended to the representation).</p> <p>-Scenario 1 is based on Council timescales for the NWRR and sees completion of the site by 2035/36, but taking into account above factors and associated timescales, is wholly unrealistic - supported by legal opinion.</p> <p>-Scenario 2 is considered a highly optimistic best-case timescale for the delivery of the NWRR and site SHR173 thereafter. It involves completion in 2039 but highlights little flexibility in Council assumptions (also raises concerns about the financial package as timescales involve development before associated payments from the Shrewsbury West Sustainable Urban Extension (SUE) relied upon for the NWRR - payments for the first phase expected in 2023/24 and 2025/26 based on Council assumptions in the Five Year Housing Land Supply Statement, outside the construction programme of the NWRR. Furthermore subsequent phases (apart from a mixed use development for formation of roadside services) have not been subject to Planning Applications but presumably contribute to the NWRR. This site has been subject to significant delay as evidenced in delivery assumptions made at the time the current Local Plan was adopted).</p> <p>-Scenario 3 represents a set of realistic timescales (again supported by the legal opinion) which would see the construction of the NWRR completing end of Q1 2030 and commencement of SHR173 in 2035, towards the end of the proposed plan Period and completion in 2042, beyond the proposed Plan period (funding issues associated with the Shrewsbury West SUE under scenario 2 still apply).</p> <p>Also highlight that delivery of the NWRR requires significant funding of around £85m in total of which £17m (plus any cost increases) is to be funded by Shropshire Council - no evidence of where this is coming from. Further LEP funding of £4.2m must be spent by 2024, raising concerns about whether this will be lost. Shrewsbury West SUE is expected to make £8m financial contributions to the NWRR but has been subject to significant delays, affecting payment of financial contributions and leaving a further gap. Finally construction costs have increased and public finance is less certain due to the pandemic, meaning funding from the NWRR is highly uncertain based on available information.</p> <p>This raises soundness issues regarding the draft Shropshire Local Plan - to be effective it must be deliverable over the proposed Plan period (key focus of examinations), based on realistic assumptions about what can be achieved and when. This includes paying careful attention to providing an adequate supply of land, identifying what infrastructure is required, how it can be funded and brought forward (whilst considering viability) informed by discussions with site promoters. Whilst accept extensions to existing settlements may not have 'certainty' and/or funding secured for necessary strategic infrastructure, still need to demonstrate there is a reasonable prospect proposals can be developed within timescales envisaged. These issues are often the cause of failures of Plans, particularly where planned infrastructure is dependent on willing landowners (example provided).</p> <p>SHR173 cannot be considered deliverable and is unsound on the basis that it is not justified by clear evidence nor will it be effective due to serious concerns over deliverability of the associated NWRR (timescales and funding).</p> <p>Land at the Berwick Estate should be allocated to deliver up to 450 dwellings as a first phase of development (as part of a comprehensive, long term Whole Estate Plan to deliver a range of public and environmental benefits whilst ensuring the Estate, including its numerous listed buildings and registered park and garden, remain viable in years to come) in the proposed Plan period. This will safeguard delivery of the NWRR (contribution in lieu, assisting funding and delivery timescales) of the road and the subsequent delivery of any allocations that rely on the NWRR. Representation supported by a transport note. This could also assist in delivering environmental initiative and ecological off-setting/carbon off-setting associated with the NWRR. A transport note (appended to this representation) demonstrates 450 dwellings can be delivered on this site in advance of the NWRR. Site guidelines could include appropriate improvements to the highway network, effective and justified sustainable transport initiatives and garden village principles. Legal opinion provided in support of this representation.</p>
A0522	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendices 5 and 7	Not Specified	No	Not Specified	<p>Para 73 of the National Planning Policy Framework (NPPF) sets out that local plans should include a trajectory illustrating expected rate of housing delivery over the plan period for strategic policies. Furthermore, it requires that local planning authorities should identify and update annually a supply of deliverable sites to provide a minimum of five years' worth of housing supply. The Plan as it stands is not consistent with para 73 of the NPPF as it does not include a detailed housing trajectory, nor is there an updated housing land supply position that reflects the years 2020/21 – 2024/25 as per the proposed housing requirement and trajectory.</p> <p>Given issues highlighted in these representations around timescales and deliverability of selected site allocations, a modification to the plan by way of the inclusion of a detailed housing trajectory is required as a matter of soundness.</p>
A0523	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	WHT044	Yes	No	Yes	<p>Historically little development had occurred in this part of Whitchurch (around WHT044), but 4 schemes have occurred in the last 6-7 years, which is why the site is now described as infill. Rather it is loss of remaining fields and hedges.</p> <p>WHT044 is subject to groundwater issues which have caused problems for properties and damaged roads.</p> <p>Significant development has occurred in Whitchurch over the last 25 years and 500 dwellings at Tilstock Road is underway after delay. Brownfield sites such as Mile Bank Creamery should be prioritised. Given extent of approved development, see no need for WHT044.</p>
A0524	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	No	Not Specified	<p>Para 4 of draft Policy DP11 and para 4.112 of the explanation to draft Policy DP11 are unsound.</p> <p>Concept that a development cannot be rendered energy efficient because it would make it economically unviable has been used many times in the past to avoid environmental responsibilities whilst minimising costs and maximising profit.</p> <p>People who occupy affordable housing are those who would benefit most from energy efficient homes with low energy costs. It is discriminatory to permit housing to be provided for the less well off which do not have the energy efficient features of houses occupied by the better off.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0522	B001	<p>Two options to address soundness of the draft Shropshire Local Plan:</p> <ol style="list-style-type: none"> <li>Delete proposed allocation SHR173 and instead allocate an alternative site.</li> <li>Retain proposed allocation SHR173 (acknowledged as deliverable in later years of the proposed Plan period) and supplement it with additional site allocation of a similar scale, capable of full delivery in the proposed Plan period. This will build additional flexibility in a plan-led manner (not reliant on the delivery of windfalls).</li> </ol> <p>Land at the Berwick estate should be allocated for around 450 dwellings, development of this land will safeguard delivery of the NWRR.</p>	<p>Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.</p> <p>With specific regard to site SHR173 it is considered that appropriate and robust assumptions have been made with regard to delivery timescales. Furthermore, the delivery timetable proposed by the objector, and which is relied upon to a significant degree to forward the wider planning and legal argument, is not recognised by the Council.</p>	No
A0522	B002	Modify the draft Shropshire Local Plan to include a detailed housing trajectory.	<p>As specified within the explanation to draft Policy SP2, whilst it is acknowledged that there will inevitably be fluctuations over time, which may result in annual rates of delivery falling below or exceeding this level, it is expected that this will 'balance out' to ensure that the housing requirement is achieved. As such, it is considered that this expected rate of delivery over the Local Plan period of around 1,400 dwellings per annum forms the most robust trajectory of future housing delivery in Shropshire and will be used to assess annual housing delivery.</p> <p>This is considered a reasonable and precautionary approach to preparing a housing trajectory. This trajectory of future housing delivery will be kept up to date and a revised version published each financial year within Shropshire Council's Authority Monitoring Report (AMR).</p> <p>Shropshire Council also considers that it has a robust five year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. Appendix 5 illustrates this supply - identified completions, commitments (including existing and proposed allocations) and appropriate windfall allowances (for settlements with development guidelines). This will be reviewed annually through the Five Year Housing Land Supply Statement and the Authority Monitoring Report.</p>	No
A0523	B001	Removed proposed allocations WHT037 and WHT044.	<p>Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>	No
A0524	B001	Economic viability clauses in para 4 of draft Policy DP11 and para 4.112 of the explanation to draft Policy DP11 should be removed. All housing should in future be energy efficient.	<p>The Council considers that this policy introduces effective and appropriate policy requirements for new development to contribute to reducing impact on climate change, whilst also ensuring compliance with national policy and legislation and ensuring the continued viability of development.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0525	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Not Specified	No	Not Specified	Clive should not be identified as a Community Hub as two services/facilities identified within the Hierarchy of Settlements Assessment are no longer presented. Specifically the bowling green is located within a private garden (and has been for 2 years) and the village shop has now closed (October 2020) and the owner has confirmed it will not be re-opening. Taking these out would lower its score to 47, meaning Clive would no longer exceed the threshold for Community hub status. The post office operates only 2-4 hours a week and as such does not warrant significant points for this service.
A0526	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Condover	Not Specified	No	Not Specified	The Shrewsbury Place plan area disregards the significance of the settlement of Condover which is a major settlement close to Shrewsbury on the southern side and should be a community Hub delivering substantial housing development. The proposal to rely solely on the Neighbourhood Plan to possibly bring any form of housing forward renders the Plan unsound and is an abdication of the Councils duties a LPA.
A0526	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1, S5.1	Not Specified	No	Not Specified	The Local Plan Review is unsound as it does not deliver the stated objectives of this policy in this settlement and fails to deliver any new allocations for housing development. Instead, it relies on a just two sites which has been saved from the previous SAMDev consideration, but two that have not been delivered in the last 8 years. Other SAMDev sites which were previously included at the expense of site CST028 have all failed to deliver any housing for the settlement and have been withdrawn. The upshot is that the last significant planning permission that was granted in this Key settlement of Church Stretton was granted in 2008 renewed in 2011 at Lawley Close. Given that none of the SAMDev sites have delivered any measure of housing and no new housing site allocations are proposed in this review, which takes in a plan period up to 2038, the Development Plan will have failed to meet the housing needs of the settlement and the area that it serves in terms of housing allocations for more than 28 years. The only housing that has been delivered are windfalls and housing delivered by extant consents granted before and prior to SAMDev.
A0527	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.2 Pipe Gate	Not Specified	No	Not Specified	The Community Hub relates to all three parts of the settlement – It is irrational not to include all parts of the group of settlements for inclusion from housing development which is sustainable without reasoned justification and. All the more so when the presence of the Public House IN PIPE GATE close to our site was an important consideration in the original allocation of this cluster grouping for housing development. The landowners of Pipe Gate are entitled to equal consideration. For this reason the plan is unsound
A0528	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.2 Colehurst	Not Specified	No	Not Specified	Whilst Woore, Irelands Cross and Pipe Gate are included as a cluster in the Market Drayton Community Hubs, Colehurst is not included. There is no rational or objective reason for this exclusion and the plan is unsound for this reason. Relationship with the main town and each of the other settlements is similar and spatial relationship to services are no different. This settlement was identified as sustainable at the SAMDev stage but was removed as soon as someone stepped forward to actually build houses here.
A0529	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6 and S10	Yes	No	Yes	Ludlow is designated as a Principal Centre in the Local Plan Review where only two housing sites were allocated. As a Principal Centre there should be a broader portfolio of sites allocated by the Council. For the Council to maximise housing delivery, the widest possible range of sites should be required in order to offer the widest possible range of dwellings. In the previous consultations periods, we have suggested the inclusion of our client's land in Ludlow as it provided scope for deliverable housing. It appears that Council did not give sufficient consideration to the benefits of this site to deliver housing. It is unclear why Shropshire Council continue to omit our client's site from the development boundary for Ludlow as it represents logical infilling of the existing frontage of development - the Council have given no explanation as to why.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0525	B001	Update the Hierarchy of Settlements Assessment to remove the points attributed to Clive for the bowling green and village shop. This results in the settlements score dropping below Community Hub status. Remove Community Hub status from the settlement within the draft Shropshire Local Plan.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0526	B001	Condover should be a community hub. Our proposed site should be included.	Shropshire Council considers that the approach to identifying proposed Community Hubs, through a Hierarchy of Settlements Assessment, is appropriate. It is also considered that the methodology applied within the Hierarchy of Settlements Assessment, is appropriate and has been applied consistently across Shropshire. As such is considered appropriate for Condover to not be identified as a proposed Community Hub.	No
A0526	B002	Include the SLAA Site CST028 for a housing allocation in the LPR delivering the many public benefits it will bring. It can also facilitate access to the "long term potential" CST033 and 034 sites, thereby unlocking their development potential and provide a more cost-effective alternative access to the 14/01173/OUT site, thereby facilitating its delivery.	Shropshire Council considers that the proposed development strategy for Church Stretton and the existing commitments (including the existing allocations) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities, including its location within the Shropshire Hills AONB.	No
A0527	B001	Consider Pipe Gate for Limited housing development especially self build housing which would be welcome by the Landowners	Pipe Gate forms part of a wider Hub with Woore and Irelands Cross. Shropshire Council considers the proposals for the Hub is appropriate. It should be noted that the Woore Neighbourhood Plan was recently adopted and allows for housing development in the settlement. Self-Build development should be discussed at the planning application stage.	No
A0528	B001	Include Colehurst as a settlement in the Market Drayton at 11 .2	Shropshire Council undertook a robust Hierarchy of Settlements process where it was found that Colehurst did not have a sufficient number of facilities or services to be classified as a Community Hub.	No
A0529	B001	We would request that our clients land at The Linney is considered for allocation. The site lies in a sustainable location providing easy access to a range of services and facilities. Whilst also providing logical infilling of the existing frontage along The Linney. The site has the potential to help meet housing requirements of older persons accommodation, something which is in high demand in Shropshire. The provision of specialist housing should be given sufficient consideration.	Shropshire Council considers that the proposed development strategy for Ludlow and the existing development commitments with the existing and proposed housing and employment allocations are appropriate, effective, sustainable and deliverable and make a sufficient contribute towards achieving this strategy. In identifying the two proposed, brownfield housing allocations, a comprehensive site assessment process has been undertaken which included the consideration of this other promoted site which has previously been refused for development for reasons including the impact on the heritage assets in the town including the Grade I listed Ludlow Castle. Consequently, the comparative benefits of the proposed allocations when compared to this promoted site and with the significant housing commitments already approved in the town, means that the land at The Linney is not required for development in Ludlow at this point in time.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0530	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2	Not Specified	No	Not Specified	The settlement comprises three cluster of development north, south and central all of which contribute to the services and welfare of the community. They are all linked by the same A49 highway and the same foot path. In terms of physical compactness and visual appreciation they are little different and certainly no different to warrant excluding the Northern Cluster from the settlement for an allocation for housing development . This is irrational and unsound.
A0531	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17	Not Specified	No	Not Specified	Fails to address the duties under the Self Build Acts or allocate sufficient land (if any) for self build and custom build housing. The site at Chez Nous was specifically put forward to meet an existing need by 3 local residents and an additional 5 plots for other interested self build residents. This representation concerns Wem Place Plan S17 site allocations and the failure to include land at Chez nous for self build housing and the failure of the LPR to properly address the need for self build housing expressed by the hundreds of registrants
A0532	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S10.2 Burford	Not Specified	No	Not Specified	The land at BUR008 is well related to the settlement of Burford. It is land that can be provided to meet the employment needs of the locality as well as housing needs. It is and put forward by a significant local business who have the resources to deliver the requested allocation. The considerable self-build demand is unmet in the south of the County and this proposal will provide dedicated land for custom build / self-build. Without providing a dedicated land allocation for employment use existing business will not be able to plan for their expansion. This in my view is a serious flaw which renders the Plan as presently proposed unsound.
A0533	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8, SP9 and S5	Yes	No	Yes	Disagree with the Council's intentions in Policy S5 not to identify any "Hubs" or "Clusters" in the Church Stretton Place Plan. In particular, in the case of All Stretton, given the history of blanket opposition from the community to any new development, it is highly unlikely that the Parish Council will put forward All Stretton as a potential Cluster settlement.
A0534	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.3	Yes	No	Yes	The Council appears to have removed the Community Cluster status of Uffington without reasoned justification. This is surprising in the circumstances that the SAMDev housing requirement for Uffington has not been delivered by the development allocated UFF006/10 site which has only provided a single very large dwelling. No discussions have taken place with the landowners or LSP as their agent in there regards despite the interest shown by the landowners in making their land available for development over a number of years and who are currently looking to collaborate with a developer, to put together a scheme of cross subsidy housing which would provide a range of housing opportunities in the village and local community area.
A0535	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0530	B001	Include the northern area of the settlement for a housing development and the site that has been fully considered with plans and reports attached for five self build houses	Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement. The Development Boundaries are considered appropriate for each of the Hubs in relation to their built form and areas which are appropriate for development over the plan period.	No
A0531	B001	Include the land at Chez Nous for self build housing restricted to parties on both part 1 and part 2 of the register, deemed to be so if the Council does not adopt both sections in its policy.	Noted. Shropshire Council considers that the proposed development strategy for Wem and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0532	B001	Allocate sufficient land on SITE BUR 8 for the industrial /commercial needs of two local companies and others that may be in need in the plan period combined with a mix of residential land which will add economic support	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Burford. Consequently, it is considered appropriate that Burford is identified as a proposed Community Hub and it is further proposed to identify a development guideline of 190 dwellings, a development boundary and housing allocations on sites BUR002 and BUR004 (it should be noted that site BUR001 is now under construction for a mixed tenure affordable housing scheme). Shropshire Council also considers that this proposed development strategy for Burford and the existing and proposed allocations identified to contribute towards achieving this strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying the proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this other promoted site. The development boundary for Burford is focused on the areas of the village to the west and east of the River Teme bridge link into Tenbury Wells drawing together all the principal services for these two related towns. To the east, the boundary draws together site BUR002 with the Lower teme Business Park but BUR008 is situated beyond these two sites and forms part of the countryside surrounding the town and extending into the floodplain of the River Teme. Consequently, the comparative benefits of the proposed allocations compared to the promoted site BUR008, the already significant scale of the Burford development guideline figure and the sufficient capacity of proposed allocations BUR002 and BUR004 to help deliver the proposed 190 dwellings means that site BUR008 is not required for development at this point in time. It is noted that BUR008 is also proposed for employment development and that demand has been expressed by local companies in recent times. It is understood that these demands are now likely to be met in other locations and so, the need for further employment land provision in Burford beyond the significant areas of the Upper and Lower Teme Business Parks has not been made out at this time.	No
A0533	B001	Shropshire Council should remove the part of Policy S5 concerning Hubs and Clusters and instead rely on professional assessments of the sustainability and suitability of All Stretton to determine its future status in the hierarchy of settlements within Policy SP2. An Inspector from a previous appeal ref: 3149461, agreed that All Stretton's development status should clearly be altered from "open countryside" to a named "cluster" settlement. This would enable Shropshire Council to support appropriate housing development in accordance with Policy SP8 on our client's land at Starr Lane. Our client's land will enable the development of a mixture of house types which reflects the requirements of policy to support different categories of housing need in Shropshire. We therefore ask the Inspector to consider the status of All Stretton and our client's land for allocation.	Shropshire Council considers that the approach to identifying proposed Community Hubs, through a Hierarchy of Settlements Assessment, is appropriate. It is also considered that the methodology applied within the Hierarchy of Settlements Assessment, is appropriate and has been applied consistently across Shropshire. As such the list of proposed Community Hubs is considered appropriate. Shropshire Council also considers that the approach used to identify Community Clusters, by which communities can opt-in or opt-out is appropriate and reflects the intended purpose of such Community Clusters - settlements with aspirations to maintain or enhance their sustainability.	No
A0534	B001	Consider the development status of Uffington should remain as a 'Cluster' with further sites being allocated to address the shortfall in delivery since the SAMDev was adopted and meet the growing need for the different types of housing identified in the NPPF and the draft Local Plan (Policies DP1-DP7). Our client has a site suitable of providing a mix of housing types, and is considering submitting a planning application with a developer.	Shropshire Council considers that the approach used to identify Community Clusters, by which communities can opt-in or opt-out is appropriate and reflects the intended purpose of such Community Clusters - settlements with aspirations to maintain or enhance their sustainability. As such, it is considered appropriate for Uffington to be classified as countryside.	No
A0535	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0536	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8 and S14	Yes	No	Yes	As Ruyton XI Towns is a Community Hub, more than one site allocation should be identified as there is then more potential for delivery. There appears little evidence that proposed allocation RUY019 will be released for development in the near future, as it is currently used as a haulage site. As such RUY005 should be included as a proposed allocation. RUY005 lies in a sustainable location within walking distance (existing footway) of services and facilities and would represent infill development. Appears the Council did not give sufficient consideration to the benefits of this site to deliver housing.
A0537	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 BIT022	Not Specified	Not Specified	Not Specified	Agree with the allocation, however the housing guideline is too low. Given the housing guideline for the settlement is 30, this site should take all of these dwellings. The council should consider increasing the housing guideline for Bicton. The site can be extended north to accommodate further dwellings if required.
A0538	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	Hubs and Cluster designations are based on flawed logic (including Trefonen).
A0539	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1	Not Specified	No	Not Specified	Too many houses for the size of the town, there is already been allocated the building of 500 homes which is more than sufficient for Bridgnorth. The towns current infrastructure will not support a Development of a further 1,000 homes; it is not sound. Infrastructure would struggle with the numbers proposed.
A0540	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Ford	No	No	Not Specified	Ford does not enjoy the facilities to cope with the housing proposed in the LPR. Previous developments in the village have been met with false promises. Further house building in Ford before the promised infrastructure changes are delivered is, therefore, contrary to the Government's and the Council's own guidelines. Ford is not a Hub by any nationally agreed definition and lacks many services. School numbers cannot cope. 125 is contradictory to the Government's green strategy and the Council's 2019 declaration of a climate emergency. Car dependency - affects climate change. No local demand for affordable housing. The current proposal appears to be no more than a justification for meeting a house-building target, away from real Community hubs and with no apparent regard for the quality of life of those who live there. The consultees' comments were never presented to the decision-making body. What was presented instead was a 'summary' of the comments. These summaries were so short, and so general in nature that the thrust and importance of the issues raised was lost. This appears to be a clear case of maladministration by Shropshire Council.
A0541	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9.2	Not Specified	No	Not Specified	The inclusion of a maximum site area (MSA) of "of 0.1ha or less" is unjustified, ineffective and is inconsistent with the NPPF. None of the evidence base included with the Regulation 19 documents gives any justification for the inclusion of a MSA. The respondent has directly requested confirmation of the evidence used by the LPA to justify the inclusion of the MSA and the LPA have failed to provide such evidence. The desire or need to limit scale is understandable particularly having regard to consultation responses to various draft documents however at no point has a MSA or 0.1 hectares been justified in terms of being an appropriate figure and/or why a figure more or less than 0.1 hectares is not appropriate. Removing the MSA text whilst retaining the unit number limit of 3 dwellings will be more than sufficient and effective to control the scale of development when read in conjunction with policy SP9.4a. Having the MSA goes beyond what is necessary for the policy to be effective. In the absence of evidence such as character assessments of the proposed Cluster settlements there is no justification that restricting "infill" to sites with "permanent and substantial buildings on at least two sides" is appropriate having regard to the context of these rural settlements.
A0542	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 HDL006	Yes	Yes	Yes	I fully support Hadnall Parish Council's endorsement of HDL006 as the preferred site and the adoption of Hadnall as a community hub. I would also like to see HDL008, HDL009 and HDL014 included within the development boundary.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0536	B001	RUY005 (plan appended to representation) should be considered for allocation.	Noted. Shropshire Council considers that the proposed development strategy for Ruyton XI Towns and the proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.	No
A0537	B001	BIT022 should increase its guideline to at least 30 dwellings	Shropshire Council considers the proposed capacity of BIT022 is appropriate. It should be noted that Para 4 of Draft Policy S16.2 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.	No
A0538	B001	n/a	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment, used to identify proposed Community Hubs, is appropriate and has been applied consistently across Shropshire. It is also considered that the approach to identifying proposed Community Clusters is appropriate.	No
A0539	B001	The garden village at Tasley needs to be removed entirely from the plan; it is unnecessary there is an area already designated for 500 houses at Tasley. Bridgnorth would be turned into a dormitory town and not the attractive market town it currently is. There is no demand from the point of view of population growth in Shropshire; there is enough planned housing across the county more than adequate for any future growth in population.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken, which included consideration of an appropriate range of factors used to identify constraints and opportunities. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to infrastructure provision.	No
A0540	B001	Remove Ford's hub status. The Plan is amended to defines how an upgrade to the primary schooling capacity in Ford will be delivered before any new house building in Ford is approved. The plan is amended to reconcile the climate and environmental impact of additional house building in Ford with national and local requirements and aspirations, before any new house building in Ford is approved. The Plan details the evidence that there is local demand for 125 new homes in Ford before any new house building in Ford is approved. The Plan mandates a full assessment of the capability of all local services to cope with 125 new homes and that changes required as a result of that review are implemented before any new house building in Ford is approved. The Council re-runs the review of the public comments with the FULL text of the comments, un-edited by Council office workers, and re-issues the Plan following that review.	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Ford. Consequently, it is considered appropriate that Ford is identified as a proposed Community Hub and it is further proposed to identify a development guideline, development boundary and a housing allocation on site FRD011 consistent with other rural settlements considered to be appropriate for designation as a Community Hub for policy purposes. Ford has a service points score of 51 points above the threshold of 48 points to be designated as a Community Hub. This service score recognises the accessibility of the village from Shrewsbury by public transport and its broadband connectivity to electronic communications and services. The village also has a good range of local services including a primary school, local shop and petrol filling station, community hall, mobile library service, public house and church with a range of outdoor sports and play spaces. The proposed allocation FRD011 is expected to meet its own infrastructure requirements and to further improve the capacity of services where necessary to improve the infrastructure capacity of the village. It is therefore considered that Ford is appropriately designated as a Community Hub in the draft Shropshire Local Plan along with the allocation of site FRD011 for housing development.	No
A0541	B001	Amend policy SP9.2.c. to: "c. On suitable small-scale infill sites, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides or one side where there are existing permanent and substantial buildings onsite and are for up to a maximum of 3 dwellings"	Noted. It is considered that the definition of infill plots provided within draft Policy SP9 is appropriate. It provides a level of certainty to local communities and the development industry about the types of sites that are suitable for such development - in terms of location, size and capacity; ensures an effective use of land; but also allows for flexibility to density, design and layout, as the referenced site size (0.1ha or less) and capacity (maximum 3 dwellings) are maximums. As such it recognises the diverse nature of Community Clusters and the settlements within them.	No
A0542	B001	n/a	n/a	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0543	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0543	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	The proposed employment allocations at Stanmore are presented in the Local Plan Review as being necessary to serve the needs of Bridgnorth, and the Stanmore area is presented as being part of Bridgnorth town. This is not the case. The Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment. It is located in open countryside and does not form a natural extension to Bridgnorth. The Local Plan Review Policy S3.1 indicates that the Bridgnorth area will deliver 1,800 houses and 49 ha of employment land in Bridgnorth. The Strategic Land Supply 2016 – 2038 set out in Appendix 6: Employment Development Guidelines and Employment Land Supply, however, indicates that a total of 40.5 ha of land is to be allocated in the Place Plan Area, with only 37.7 ha to be provided in Bridgnorth. Clearly there is a discrepancy in the figures. The Local Plan does not explain why it is necessary to allocate 49 ha of employment land in Bridgnorth The discrepancy appears to be around the amount of development proposed for employment uses at Stanmore. It does not appear that the figures support this allocation. Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0543	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	The aims of this policy are not supported by, or conflict with, the aims of other policies in the Plan Review. In particular and in relation to the proposed industrial allocations at Stanmore, because such development would not “contribute to meeting local needs” or to “making settlements more sustainable” as Policy SP1 requires. The settlement at Stanmore is very small and does not require 11.5ha. of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the Plan.
A0543	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	The sites proposed for employment development at Stanmore is situated in open countryside, and are accessed through a country park. The Council, and the local residents in the Stanmore area, have gone to great lengths in the past to preserve this situation. Policy SP10 of the Local Plan Review proposes to restrict economic development in rural areas in line with national guidance. Policy SP10 says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. There is no guarantee that the proposed allocations will produce that effect, so the proposed allocations are an attempt to side-step such limitations for future developers. There is no reason why such allocations should be made, the countryside should continue to be protected. The reasons why this area of countryside should not be protected as the majority of the rest of the rural area of the County are, have not been justified and the need for the proposed allocation has not been properly evidenced.
A0543	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	The sites proposed for employment development at Stanmore are located in the Green Belt and Policy SP11 sets out to protect the Green Belt. The proposed allocation would remove the land from Green Belt protection without any exceptional circumstance being demonstrated. There is no indication of which businesses might wish to locate at Stanmore, and so the proposal appears to be a device to ensure that future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, that is, that proposals have to demonstrate that ‘very special circumstances’ exist. Policy SP11 says that the Green Belt will be protected in accordance with national policy. National policy is to protect green belts from ‘inappropriate development’. Inappropriate development can be anything that detracts from the fundamental functions of green belts, which are to preserve their openness and to ensure their permanence. The National Planning Policy Framework says, at para 145, that local planning authorities should regard the construction of buildings as being “inappropriate” on a green belt, unless they are for certain, specified, uses – none of which include new development for industrial purposes. The re-lease of 11.5ha of land from the Green Belt at Stanmore for use for industrial or storage purposes, and the construction industrial buildings could not fail to have an adverse effect on the Green Belt which will continue to surround the proposed allocated sites. The proposed release of land from the green belt has not been justified, and the need for the land to be made available for employment development has not been evidenced. It is likely that, if approved, this allocation would be used for further unjustified incursions into the green belt in the future.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0543	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0543	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0543	B003	Sites STC002 and P58a – allocated for employment development at Stanmore – should be deleted from the Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a ‘gateway’ policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0543	B004	Sites STC002 and P58a – allocated for employment development at Stanmore – should be deleted from the Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0543	B005	Sites STC002 and P58a – allocated for employment development at Stanmore – should be deleted from the Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0544	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0544	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0544	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0544	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0544	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from ‘inappropriate development’. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is ‘inappropriate development’, unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating ‘very special circumstances’. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0544	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0544	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0544	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0544	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0544	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0544	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>Apart from need for affordable housing, no evidence of local demand for a fraction of the housing proposed at Tasley (Bridgnorth). Some new housing (primarily affordable), would be welcome but it needs to be of a volume compatible/sensitive to the needs of the town and its current and future residents. Proposals seriously risk causing significant damage to the attractive historic market town that is Bridgnorth and loss of good quality farmland is outrageous (compounded by the suggestion that further such land might be annexed in the future).</p> <p>Majority of local residents are opposed to these proposals, but these views appear to have been disregarded.</p> <p>There is already land earmarked for housing which would satisfy local demand for many years.</p> <p>Local businesses have no aspirations for expansion and there is no evidence employers view Bridgnorth as a location for expansion (given transport links and negligible public transport) of the type predicated in the draft Shropshire Local Plan. Also seems unlikely housing proposals would provide enough employees of the type required to service assumed employment types (tech and IT jobs), meaning a need for increased in commuting.</p> <p>Describing BRD030 as a garden village is misleading. It would become a vast housing estate, attracting incomers from the West Midlands and proposals do not adequately address need for affordable housing.. Its development would have a catastrophic impact on services and facilities (already over-stretched), road infrastructure (particularly the A442 given residents are likely to commute to Wolverhampton and the West Midlands) and pollution (particularly bad on Hospital Street) this has not been adequately considered.</p>
A0545	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S10	Not Specified	Not Specified	Not Specified	<p>In the Regulation 18 Pre -Submission Draft Shropshire Council stated: "Any further expansion into Ludford Parish is deferred to focus on the delivery of housing within the town." (Schedule 10.1 sub section 5.134 page 204.) Ludford Parish Council wholly supports this view and recorded this in the parish response to the consultation.</p> <p>LPC is concerned that the definitions used by Shropshire Council in the Site Assessment schedules lack sufficient strength and clarity for both the professional and lay reader. Sites that are regularly and repeatedly reviewed have remained in these schedules since the inception of SAMDev. Consequently, these sites could remain vulnerable to challenge as wind fall sites. The protection of Foldgate Lane proved to be completely inadequate at the public enquiry, at great cost to both the local environment and the public purse.</p> <p>LPC request that Shropshire Council states that the designation of "countryside" for the southern approach to the town and areas the east of the A49 will remain in place for the length of this plan (2036) and beyond. By assessing green field sites in this way, and opening up the possibility of a challenge to Shropshire Council's assessment system, the discipline of properly using more difficult brown field sites instead, is an unattractive option for developers.</p>
A0546	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2 WBR010	Yes	Yes	Yes	We support the legal compliance and soundness of the Reg-19 Draft. Site WBR010 is highly deliverable and will provide much needed pedestrian footway along the road frontage for the village and there is already strong interest from developers and to deliver the appropriate housing for the community in a short time period.
A0547	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2.2 BKL008a	Yes	Yes	Yes	We support the legal compliance and soundness of the Reg19 Draft. Site BKL008a is highly deliverable and I can confirm that an Option Agreement with a developer has been agreed and the site can be developed and delivered within a short time period.
A0548	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.2 Alveley	Not Specified	No	Not Specified	<p>Plan Review/Reports appraisals are numerous in cross referencing to the Pre-Submission Regulation 19 document. The reports and information is fragmented and disjointed and it is difficult to envisage how the Local Plan will give positive guidance in relation to proposed new development. e.g. Variation in Green Belt policy assessments regarding land to be released. The Central Garage site is only listed in the Brownfield Land Registration Maps and makes no reference to this ongoing development in the settlement map.</p> <p>Likewise no reference to Green Belt land already released. Land references and numbering vary depending on the report undertaken at the time which involves more cross referencing. Where Green Belt land is to be released giving the reason of a "high weighting" for example Community benefits and that reason is no longer valid or justified, how such a decision can be rescinded. e.g. ALV/006 - 007 if deemed appropriate.</p>
A0549	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11	Not Specified	No	Not Specified	<p>Market Drayton Town Council are justified in raising concern that the marina site has not been identified in the local plan and included on the Policies Map.</p> <p>The local plan should clearly set out that the development at MDR012 and MDR034 contributes to the development of the Marina.</p> <p>Residents were consulted, as part of the Neighbourhood Plan process for Market Drayton, on the development of a Marina and there was resounding support of over 70% of residents who took part.</p> <p>A Marina development would bring economic and social benefits as identified in the current Shropshire council Core Strategy.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0544	B006	Proposals for Bridgnorth should be scaled back. development proposals should be conditional upon (1) significant improvements to local infrastructure and services and (2) reductions in air pollution which are already at unacceptably high levels along Hospital Street (A442).	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are also appropriate, effective, sustainable and deliverable. Proposed allocations have been identified through a proportionate and robust site assessment process. Draft site guidelines for proposed allocation BRD030 relate to provision of on-site services and facilities and mechanisms for improving connectivity to existing services and facilities. Furthermore draft site guidelines also include that "Any necessary improvements to the A458 Ludlow Road roundabout, the wider highway network and associated infrastructure will be undertaken, informed by Strategic and Local Highway Transport Assessments. An air quality assessment of the impact of increased vehicular movements into Bridgnorth will also be undertaken and its recommendations implemented."	No
A0545	B001	Although it is a requirement of Shropshire Council to include Ludford Parish within the Ludlow Place Plan area, Ludford Parish Council respectfully request that Shropshire Council records and respects the boundary of the parish, in all its documents. The Fishmore Brook forms the northern boundary of Ludford Parish with the Ledwyche Brook as the easterly boundary. Ludford Village lies to the south of the River Teme and lies within the Conservation Area. Ludford Parish Council also requests that: <ul style="list-style-type: none"> <li>• There is a moratorium on the use of extensive, green field sites within Ludford Parish for the length of the plan period (2036.)</li> <li>• Designation of countryside areas to be strengthened and clearly described i.e. all areas to the south Ludford Village to the boundary of the parish, to protect the historic southern entrance to the town; areas to the east of the A49 up to the northern boundary of the parish.</li> </ul>	Ludlow is the principal Market Town and service centre in the south of the County, located on the strategic corridor of the A49 Trunk Road between the Herefordshire border (south) and the Key Centres of Craven Arms and Church Stretton to the north. As the principal Market Town, the draft Local Plan identifies a strategy for Ludlow comprising a development guideline of 1,000 dwellings and 11 hectares of employment development to be delivered through the addition of two new housing allocations both comprising brownfield sites within the town and a new employment allocation LUD052 to extend saved allocation ELR058 to the east of Ludlow on The Sheet, which is a local road through Ludford Parish. The draft Local Plan provides for a development boundary around the Market Town of Ludlow to tightly contain the proposed development of the town and its adjacent employment area. This principally comprises the proposed allocations, an extensive number of committed sites for housing development all located within the town and two larger greenfield sites both granted approval on appeal. These are located at Foldgate lane (south) and Bromfield Road (north) along with the proposed greenfield employment allocations at The Sheet. These greenfield allocations are all contained within the proposed development boundary around Ludlow. Shropshire Council considers this strategy to be appropriate, effective, sustainable and deliverable and that it satisfies the scale of development required in Ludlow and makes a significant contribution to the development needs of the south of the County. There is no apparent need for further land releases for development around Ludlow and the proposed policy framework of the draft Local Plan provides a appropriate level of protection to the countryside in the Parish of Ludford surrounding the Market Town of Ludlow.	No
A0546	B001	n/a	Support noted.	No
A0547	B001	n/a	The support for the settlement strategy for Clun is welcomed and recognises that the town is appropriately designated as a Community Hub and has identified a suitable housing allocation on site CLU005 to extend the current, saved SAMDev housing allocation on site CLUN002.	No
A0548	B001	n/a	Noted. Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable and deliverable. The Draft Plan strategy has focused development in principal and key centres, but Green Belt release, to provide for allocations, are identified for Alveley to support its continuing role as a Community Hub as detailed within the exceptional circumstances statement. Allocation of sites in different parts of the village provides alternative delivery options. Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. The methodology used within the Green Belt Assessment and Review undertaken to inform the Local Plan Review is considered appropriate, proportionate and robust. Existing commitments and development in Alveley during the Plan period (2016-2038) are taken into account and contribute to the housing guideline figure. The exceptional circumstances statement details potential compensatory improvements to the Green Belt, including opportunities to for improving access. Site guidelines set out specific requirements for proposed site allocations.	No
A0549	B001	4. Whilst land is not specifically allocated for this purpose, it is recognised there are opportunities to delivery and marina and related uses on land at Victoria Farm, therefore land has been identified on the Policies Map. 5.155 In seeking to utilise the town's proximity to the Shropshire Union Canal, the development of a marina is another key objective for the Town, in recognition of the economic and social benefits this could bring as identified in the current Shropshire Core Strategy. During the process of the Neighbourhood Plan for Market Drayton a questionnaire was distributed to all residents of Market Drayton and the surrounding area. There was resounding support for the development of a Marina of over 70% of residents who responded.	It is recognised that the proposed site guidelines for these allocations do not include a requirement to financially cross-subsidise a proposed marina on land at Victoria Farm. The draft Plan does not specifically seek to allocate land for a Marina following consultation comments at the Regulation 18 stage from the Canal & River Trust, and instead policies S11.1, DP10 and SP7 provide a sufficient policy framework should such a proposal come forward during the plan period. CIL contributions from this and other development sites can of course contribute towards the a delivery of a marina. However, importantly, these sites will support improved pedestrian and cycle links the delivery of the proposed marina development and as such indirectly cross-subsidise its delivery, through enhancements to connectivity between the proposed marina site and the town - this is recognised within the proposed site guidelines for these proposed allocations which include "pedestrian and cycle links will be enhanced or provided through the site and linking into the town and to the proposed marina in order to improve the site's overall sustainability".	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0550	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0551	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	No	No	Not Specified	The change in the HoS to allow for "a larger range of services" creates subjectivity, and can manipulate the figures to allow settlements to have a score of 48 and therefore Hub status.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0550	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0551	B001	HoS - remove text relating to a larger range of services and facilities.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0552	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.50	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0552	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0553	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.51	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>
A0554	B001	See Representation A0060.	See Representation A0060.	See Representation A0060.	See Representation A0060.	See Representation A0060.	See Representation A0060.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0553	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No
A0554	B001	See Representation A0060.	See Representation A0060.	See Representation A0060.

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0555	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S5.1	Yes	No	Yes	<p>Object to the proposed residential guideline for Church Stretton, which includes a reliance on delivering 121 dwellings as windfall development (this has increased by 70 dwellings following the removal of a previously proposed allocation). No justification/evidence is given for the increased windfall allowance. As such, consider the higher windfall estimate of 121 is not achievable/not achievable without breaching National Planning Policy Framework (NPPF) guidance on development limitations in an AONB. Therefore the plan is unsound.</p> <p>Consider proposals to accommodate dwellings previously proposed to be accommodated on proposed allocation as windfall is contrary to a previous approach, by which these dwellings were deleted from the proposed guideline.</p> <p>Settlement residential guidelines are in effect targets (clear in draft Policy SP7). As such, the proposed residential guideline for Church Stretton needs to be fully justified by proportionate evidence and capable of delivery without breaching national policy. No calculation of local housing need for Church Stretton has occurred (implying the guideline is intended to meet wider needs/growth objectives contrary to national policy and guidance). Therefore essential tests of soundness are not met.</p> <p>The windfall allowance for the town is undeliverable because it exceeds a reasonable expectation of the capacity of small scale Brownfield development within the development boundary. Consider total capacity of such sites is 62 dwellings (22 permitted, 30 on brownfield sites and 10 on garden infill sites), well short of 121 dwellings. In effect, achieving the residential guideline for Church Stretton relies on possible exception sites under draft policies DP4 and DP7. Such sites are likely to require major development within the AONB. A residential guideline in the AONB is unsatisfactory if it implicitly relies on major development. Para 5.145 of the explanation for draft Policy S10.4 states major development requires evidence of exceptional circumstances and this necessitates provision of planned development to meet community needs. This equally applies to Church Stretton. Emphasis on planned development should apply throughout the draft Shropshire Local Plan (subject to evidence of need), there should not be reliance on unknown/unplanned sites.</p> <p>Para 2 of draft Policy S5.1 states the 200 dwellings in Church Stretton contribute towards strategic growth objectives in the south of the County. Strategic growth is not a need originating in the AONB. As Church Stretton is located in the AONB this is inconsistent with the general thrust of paras 11 and 172 of the NPPF (emphasises preservation and enhancement of natural beauty within an AONB), principles reiterated in National Planning Practice Guidance (NPPG).</p> <p>General assumption that Church Stretton needs affordable homes, but no assessment (consistent with NPPG principles) of the need/supply/potential sites has occurred. Consider brownfield sites are unlikely to make a significant contribution towards affordable housing, so potential for exception sites should be considered. Proposed reduction to the settlement guideline would not inhibit this calculated need being met (this possibility is identified in para 3 of draft Policy S5.1 and such considerations are recognised in para 4 of draft Policy SP7).</p>
A0556	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan. Windfall estimates for Church Stretton over the various Local Plan Review consultations (and the adopted Local Plan) have been volatile, ranging from 21 dwellings to 121 dwellings.</p>
A0556	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0555	B001	<p>Para 2 of draft Policy S5.1 should be revised to state "the role of Church Stretton as a Key Centre will be maintained by providing 130 dwellings and around 2ha of employment development. New housing and employment development should respond to identified local needs within the AONB and conserve and enhance local landscape and settlement character."</p> <p>The residential guideline for Church Stretton should be reduced to 130 dwellings (of which 51 will be delivered through windfall development) - within both relevant draft policies and Appendix 5 of the draft Shropshire Local Plan.</p> <p>A robust estimate of the requirement for affordable housing exception sites outside the proposed development boundary (undertaken by Shropshire Council and the Town Council with assistance sought from the relevant housing associations) and the ability to provide them within the proposed Plan period is required (para 3 of draft Policy S5.1).</p>	<p>Shropshire Council considers that the proposed development strategy for Church Stretton and the existing commitments (including the existing allocations) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities, including its location within the Shropshire Hills AONB.</p> <p>Shropshire Council would highlight that there are currently 88 households on the HomePoint housing waiting list which have identified a first preference to live in Church Stretton, of which 78 have indicated at least one local connection to the town (a breakdown of the bedroom number requirements for these is as follows: 37 x 1 bed; 26 x 2 bed; 14 x 3 bed; and 1 x 4 bed).</p> <p>We would note that those currently on the housing waiting list, alongside the suggested capacity of brownfield sites (40 dwellings) provided by the respondent totals 118 dwellings, comparable to the proposed windfall allowance.</p> <p>We would also note that Church Stretton Town Council have recently undertaken a housing survey for Church Stretton town, which was supported by Shropshire Council.</p>	No
A0556	B001	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A0556	B002	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0556	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0556	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0556	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0557	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0557	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0556	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0556	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0556	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0557	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0557	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0557	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0557	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0557	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0558	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0558	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0557	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0557	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0557	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0558	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0558	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0558	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
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A0558	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0559	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0559	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.

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A0558	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0558	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0559	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0559	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0559	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0559	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0559	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0560	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0560	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0559	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0559	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0559	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0560	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0560	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0560	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0560	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0560	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0560	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0560	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0560	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0561	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>
A0562	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.2 Cressage	No	No	Not Specified	<p>There is a common law duty to take the results of consultation "conscientiously into account". Do not consider this has occurred for responses to the Reg 18 Preferred Sites Consultation, where the majority of respondents did not agree with the identification of Cressage as a Community Hub, its proposed housing guideline, development boundary or proposed allocation CES005.</p> <p>Cressage is incorrectly identified as a Community Hub within the draft Shropshire Local Plan. The settlement currently remains countryside.</p> <p>Traffic issues on the A458 through Cressage have not been adequately considered. Proposed allocation CES005 is accessed via the A458, this stretch of the road is narrow (two large lorries cannot pass) and speeding is common so is already dangerous, consider this danger will increase as a result of additional traffic associated with construction and occupation of this site. Traffic safety is repeatedly raised by residents in responses to the Preferred Sites Consultation. These issues are acknowledged within the draft Shropshire Local Plan but solutions are not considered effective - improved pedestrian links are welcome but need to be more specific; new development changing the perception of the village and encouraging traffic to respect amenity and safety of residents is not understandable, given it is already clear you are entering a village</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0561	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No
A0562	B001	<p>The Council should engage with the local community of Cressage and conscientiously take into account concerns regarding Community Hub status and the proposed housing guideline, development boundary and allocation CES005. This should be clearly communicated and documented.</p> <p>Reference to Cressage being a Community Hub should be deleted as they are misleading.</p> <p>Traffic safety should be properly addressed, especially for residents on Harley Road opposite proposed allocation CES005.</p> <p>Plans for footpaths and traffic calming should be more specific.</p> <p>The A458 should be re-routed to bypass Cressage.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and informed the continued development of the draft Shropshire Local Plan. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p> <p>The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was prepared for consultation. As such it presents proposals, rather than reflecting the current situation. It is acknowledged that Cressage is identified as countryside within the adopted Local Plan, however the draft Shropshire Local Plan is proposing that the settlement be identified as a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council.</p> <p>In identifying proposed site allocations, including in Cressage, a comprehensive site assessment process has been undertaken, which included consideration of highway matters, informed by comments from colleagues in the Developing Highways team. Traffic passing through Cressage already causes highway safety issues specifically because traffic control measures provide the only means to control the traffic flows and speeds. Development to meet the needs of existing and future residents of Cressage will require direct access to the A458 due to highway constraints elsewhere in the village. This form of development may also provide an effective means to reduce traffic speeds through the settlement and improve highway safety for the benefit of the local community.</p> <p>The proposed site guidelines for proposed allocation CES005 are considered to include an appropriate level of detail. The specific design and layout of development, including such features as pedestrian links, traffic calming measures and the principal highway access, will be subject to consideration through a Planning Application for the site.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0563	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.52	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>
A0564	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Bomere Heath	Not Specified	Not Specified	Not Specified	There are 3 sites to the SE of the village (off Broomhall Lane) with poor agricultural value compared to the preferred site, and these sites would fit better into the rural setting of the village.
A0565	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 Shrewsbury SHR060	Yes	No	Yes	It is clear from the draft development Strategy for Shrewsbury Town, that SHR060 is recognised as a sustainable and deliverable growth area during the new plan period, given its highly sustainable location immediately adjacent to the western development boundary of the town and unconstrained nature it forms a natural area for expansion. The site is part of a wider strategic masterplan which includes sites SHR158 and SHR161 which are promoted for development by CEG. We confirm that SHR060 is deliverable within the short term of the plan period and the landowners intention is to submit a planning application as soon as possible. The wider site including SHR158/SHR161 is also deliverable in the plan period. SHR060 is fully supported and is clearly deliverable both independently or as part of a wider masterplan and provides a significant opportunity to generate sustainable development and meet housing need through the plan period and beyond.
A0566	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 Shrewsbury Inset Map	Yes	No	Yes	We have considered and assessed the draft inset map for Shrewsbury town in some detail, and given we are now at the stage of the final details, we feel that the land to the East of Hollycroft and draft allocation SHR060 and to the West of the built housing site of SHREW019 should be included within the development boundary to allow for some form of windfall development, connectivity, cycle routes, green corridor to be provided through the plan period. It is clear from the draft development Strategy for Shrewsbury Town, that SHR060 is recognised as a sustainable and deliverable growth area during the new plan period, given its highly sustainable location immediately adjacent to the western development boundary of the town and unconstrained nature it forms a natural area for expansion. With this in mind and also the existing built out development to the East, this area would provide a great opportunity as a connectivity route between built development at SHREW019 and the proposed allocation of SHR060.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0563	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No
A0564	B001	BOM021, BOM022a and BOM022b should be allocated instead of the preferred options BOM019 and BOM020.	<p>Shropshire Council considers that the proposed development strategy for Bomere Heath and the existing commitments (including the existing allocation), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. Proposed site allocations have been informed by a robust and proportionate site assessment process.</p>	No
A0565	B001	<p>With reference to the current allocation, the principle of providing an area of land for future education needs within the allocation for SHR 060/158/161 so as to consolidate these facilities is supported, however we suggest that some form of evidence based assessment is required in order to understand the potential quantum of future education need in the local area.</p> <p>The allocation should allow for a suitable expansion area to be determined once a evidence based assessment of future education need is undertaken and prior to publication of the next iteration of the Local Plan.</p> <p>The provision of funding for road network improvements is acknowledged, however allocation wording should be amended to provide for contributions to mitigate the impact of the individual development.</p>	<p>Noted . Discussions have been had with the Council's education department and it is currently considered this scale of provision for a new education facility is appropriate to meet future needs. No change is proposed.</p>	no
A0566	B001	The land to the East of Hollycroft and draft allocation SHR060 and to the West of the built housing site of SHREW019 should be included within the development boundary	<p>Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations and definition of the proposed development boundary, will contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0567	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.1 Wem	Yes	No	Yes	WEM037 is a good site and is deliverable, sustainable, has a better SA score than some of the preferred allocations, and is positioned well in terms of highways. We are pleased to note this site has been identified as a 'Long Term Potential SLAA Residential Site' within the consultation.
A0568	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 BIT023	Yes	No	Yes	BIT023 is a well located and fully deliverable site with an area of 2.37 ha. We believe this site is suitably placed to provide the development in the Community Hub of Bicton with 30 dwellings by 2038 with 15 yet to be allocated, being situated with an access to Bicton Lane and adjoining previously developed land and the development boundary, plus walking distance to the new school. The current preferred site, BIT022 will have a much higher implications in terms of highways with it being advised in the site assessment report
A0569	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S7.1 Craven Arms	Yes	No	Yes	CRA015 is a fully deliverable site with an area of 0.87 ha. We believe this site is suitably placed to provide development in the Key Centre of Craven Arms to contribute towards the target of 500 dwellings by 2038, being situated with good access to Watling Street and situated between recently developed land to the north and established developed land to the south creating a natural infill site. The land has the benefit of being fairly flat and not situated within a flood zone, unlike much of the flat land surrounding Craven Arms which has a high flood risk
A0570	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S12.1 Minsterley	Yes	No	Yes	MIN019 is a well located and fully deliverable site with an area of 16.71 ha, however hedgerows could be planted so that the development could be phased. We believe this site is suitably placed to provide development in the Community Hub of Minsterley with 155 dwellings by 2038, being situated with an access to Leigh Road and adjoining previously developed land and the development boundary. The current preferred site, MIN018 will have a much higher implications in terms of highways. I note the comment in the site consultation appraisal: 'This is a very large, open site, which if developed would yield development which would be out of scale with the existing settlement of Minsterley.' In this respect, the northern part of the site can be put forward, instead of the whole to be developed to fulfil the required target housing supply of 20 dwellings, as well as the provision a new school car park. This will also provide future proofing with the remainder remaining available for future development if and when required.
A0571	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S12.1 Pontesbury	Yes	No	Yes	PON001 is a fully deliverable site with an area of 1.25 ha, to assist in the delivery of the remaining dwellings to meet the preferred dwelling guidance of 175 dwellings by 2038. We believe this site is suitably placed to provide development in the Community Hub of Pontesbury being situated adjoining existing housing to the south and east boundary, and a natural screen to the north of the land with the dense woodland adjoining the old railway line. The site is also adjoining an already allocated site (PBY019), presently being developed, providing a natural infill.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0567	B001	The site (WEM037) has no significant constraints. We believe this land can be considered for short term potential and should be considered for residential allocation	Noted. Shropshire Council considers that the proposed development strategy for Wem and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0568	B001	BIT023 should be considered for residential allocation	Shropshire Council considers that the proposed development strategy for Bicton and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. Proposed site allocations have been informed by a robust and proportionate site assessment process.	No
A0569	B001	CRA015 should be considered for residential allocation	The adopted Local Plan in the Site Allocations and Management of Development Plan (SAMDev Plan, 2015) set out an ambitious development strategy for Craven Arms. This strategy is proposed to be transferred in its entirety into the draft Shropshire Local Plan with the addition of a windfall allowance for 90 dwellings for further small sale housing development within the town in the period to 2038. This ambitious strategy will strengthen the role and function of Craven Arms as a Key Centre and a principal 'service' settlement for the adjoining rural areas particularly within the Shropshire Area of Outstanding Natural Beauty along the Clun/Kemp valley (west) and Corvedale (east). The strategy also reflects the location of Craven Arms on the strategic corridor of the A49 Trunk Road through south Shropshire and the proposed function of the town as a key growth point supporting the historic Market Town of Ludlow (south) and the historic Key Centre of Church Stretton. This also reflects the more commercial history and character of the centre and eastern areas of the town and Craven Arms situation as an important station stop on the Shrewsbury – Cardiff rail line at the junction with the Heart of Wales line serving mid-Wales. The town is also the business location for a key local employer (Euro Quality Lambs) that is looking to locate and expand from the centre of the town to a new bespoke site in the north of Craven Arms to create the Newington Food Park which is expected to drive the development of further employment sites allocated in the north of the town including the Phase 2 expansion of the successful Craven Arms Business Park. Shropshire Council and its partners, including Craven Arms Town Council, consider the proposed strategic approach to the level and distribution of development in Shropshire to be appropriate, effective, sustainable and deliverable including the allocations in the draft Local plan that have been saved from the currently adopted SAMDev Plan. These saved allocations in Craven Arms almost entirely comprise larger greenfield sites for which there should be a ready market and reasonable levels of viability to deliver the proposed development. It is recognised that the more commercial character of Craven Arms means that the market in this town is not as strong and resilient as the other historic towns on Ludlow and Church Stretton located on the A49 in south Shropshire. For the time being, the Brexit decision and the Covid-19 downturn have affected the delivery of the Craven Arms strategy. The strategy is also affected by further strategic infrastructure requirements to deliver a new strategic highway junction on the A49, a strategic highway link between the north and the west of the town, bridging the Shrewsbury-Cardiff rail line and serving the employment allocations to the north and the housing allocations in the west along the urban boundary on Watling Street between the town to the east and the open countryside and AONB to the west. The delivery of this strategic infrastructure will facilitate the closure of the key level crossing (at Long Lane) and avoid the proposed automation of this crossing that is expected to cause traffic delays and queues onto the A49 affecting the safe operation of this strategic Trunk Road that also serves commercial traffic crossing and serving Mid and North Wales. The Council is supporting a partnership of landowners and developers in Craven Arms to deliver this strategic infrastructure in order to help trigger the delivery of the development strategy for Craven Arms set out in the draft Shropshire Local Plan. Shropshire Council with the Craven Arms Town Council have considered whether to make further land allocations in the draft Local plan to help deliver the strategy by enhancing the viability of the overall scheme as suggested in the Craven Arms Development Brief submitted by a respondent to the draft Local Plan. The preferred strategy agreed with Craven Arms Town Council is to make a small windfall allowance for available for smaller developers to balance the larger development opportunities in the town and to help broaden the range, choice and affordability of new housing in the town up to 2038. It is also recognised that Watling Street forms a strong and defensible boundary to western areas of the town and separate the urban areas from the countryside and AONB that encloses the north and west of Craven Arms. Consequently, sites CRA015, CRA023, CRA024 and CRA025 are not considered to be necessary or sustainable additions to the development strategy for Craven Arms. These sites would also affect the setting of the settlements and heritage assets in the adjoining Sibdon Carwood Parish in a location previously only considered for development to deliver an exceptional affordable housing scheme referenced by the respondent proposing sites CRA015. Shropshire Council therefore consider the strategy for Craven Arms to be appropriate, effective, sustainable and deliverable without further allocations including sites CRA015, CRA023, CRA024 and CRA025.	No
A0570	B001	MIN019 should be considered for residential allocation	Shropshire Council have undertaken a robust assessment of all of the promoted sites and consider the approach taken to the preferred allocations as being reasonable and appropriate for the Local Plan.	No
A0571	B001	PON001 should be considered for residential allocation	Shropshire Council have undertaken a robust assessment of all of the promoted sites and consider the approach taken to the preferred allocations as being reasonable and appropriate for the Local Plan.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0572	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 SHA012VAR	Yes	No	Yes	SHA012VAR is a well located and fully deliverable site with an area of 3.84 ha. We believe this site is suitably placed to provide development in the Community Hub of Shawbury towards the target of dwellings by 2038, being situated with an established access to the A53 and adjoining developed land. Shawbury is a thriving Community Hub with local facilities such as shops, public house, post office, medical centre and a school
A0573	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S5.1 CST033 & CST034	Yes	No	Yes	CST033/034 is a well located and fully deliverable site with an area of 3.65 ha. We believe this site is suitably placed to provide development in the Key Centre of Church Stretton towards the target of 250 dwellings by 2038, being situated with an established access to the A49 (requiring improvements) and adjoining recently developed land. Due to the removal of an existing large site from the Local Plan, there is a shortfall in the housing supply for 2021-2038 in Church Stretton.
A0574	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 SHR221	Yes	No	Yes	SHR221 is a well located and fully deliverable site with an area of 10.15 ha. We believe this site is suitably placed to provide development in the Strategic Centre of Shrewsbury towards the target of dwellings by 2038, being situated adjoining recently developed land. The land is well positioned adjoining land that has gained residential planning permission and has already been developed. As being the adjoining landowners, it may be of benefit for Shropshire County Council to collaborate with our client to enable residential development
A0575	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2.3	Yes	No	Yes	The site to the south of Westbury [WEY015] is a well located and fully deliverable site. The land is well placed for the expansion of Westbury in terms of its location. Therefore, we believe Westbury should be deemed a Community Hub. The land is also well placed for access to the village hall, Church and public house. This is a site that can be fully self-contained to provide a phased level of housing required, with an access that will not have a negative impact on the existing infrastructure.
A0576	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 HDL015	Yes	No	Yes	As Hadnall has been proposed as a Community Hub, we believe this site to have significant potential, particularly as we can confirm this is a fully deliverable site with an area of 1.94 ha to deliver housing towards the preferred dwelling guideline of 125 dwellings, of which 52 remain to be identified. We believe HDL015 to be the most suitably placed to provide further parking to the Hadnall School, plus land suitable for a multipurpose sports centre, which the owner of the site has confirmed he would be pleased to make as a donation to the community subject to a review of the requirements of the school and the capacity needed (Please note: 1/3 an acre could provide up to 50 parking spaces). This land is the nearest available land to the school for car parking and providing a pavement, with access via Astley Lane. Therefore, there will be no requirement for a new access or pedestrian walkway on the very busy A49. This will provide a much safer route to the school for the children and parents than HDL006 which provides a potentially dangerous pedestrian route along the side of the busy A49.
A0577	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 West Felton WEF032 WEF002	Yes	No	Yes	This is a well located and fully deliverable site with an area of 0.33 ha or 2.00ha. We believe this site is suitably placed to provide development in West Felton towards the target of dwellings by 2038, being situated with an established access to the former A5 and adjoining recently developed land. Our proposed site WEF002/WEF032 has achieved a sustainability rating of GOOD, which is one of the better ratings compared to the other sites in West Felton. The land is well positioned with access to the highway on the southern boundary and is adjoining land that has recently gained planning permission and has already been developed for caravan storage.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0572	B001	SHA012VAR should be considered for residential allocation	Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement.	No
A0573	B001	Due to the amendments by Shropshire County Council to the key centre of Church Stretton, there is now a shortfall in the housing supply 2021-2038. On this basis we are proposing the allocation of CST033 (Watling Street North (eastern field)) & CST034 (Watling Street North (southern field)).	Shropshire Council considers that the proposed development strategy for Church Stretton and the existing commitments (including the existing allocations) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities, including its location within the Shropshire Hills AONB.	No
A0574	B001	SHR221 should be considered for residential allocation	Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.	no
A0575	B001	Westbury should be a Community Hub and WEY015 should be considered for residential allocation	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Westbury. As such it is considered appropriate that Westbury is not identified as a proposed Community Hub. As such it is not proposed to identify a development guideline, development boundary or identify proposed allocations - consistent with other rural settlements considered to be a settlement in the countryside for policy purposes. Site WEY015 is a very large parcel of land located in the centre west of the village with a primary road frontage onto the B4386 and the mans to achieve a secondary access onto the circular road route through the central Conservation Area in Westbury located to the north. WEY015 does have reasonable access to some of the principal services in the village. The site is affected within the site itself by isolated areas of surface water flooding and being located on the western side of the village is affected by flood affected areas on the primary road network through Westbury. The size and open aspect of WEY015 would suggest that the site may be too large for the potential scale of development in this smaller settlement and the site may not readily lend itself to sub-division. WEY015 has not been identified for development because the site has not been subject to a detailed site assessment and comparison with other potential development opportunities and Westbury is not proposed to be designated as a Community Hub.	No
A0576	B001	HDL015 should be considered for residential allocation	Noted. Shropshire Council considers that the proposed development strategy for Hadnall and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The proposed allocation have been informed by a proportionate and robust site assessment process. The proposed development boundary is also considered appropriate.	No
A0577	B001	WEF002 and WEF032 should be considered for residential allocation	Shropshire Council undertook a robust site assessment for all sites promoted for housing or employment. In terms of WEF002 and WEF032, the conclusions in the site assessment was:  WEF002 - "As the sites availability for residential development is unknown the site will not proceed to the next stage of the site assessment process."  WEF032: "Site is slightly set away from the core of the settlement. There are other more suitable sites to allocate."  Shropshire Council still considers that the preferred allocation (WEF025) is a more suitable site for allocation.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0578	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.4 Sutton Maddock Shifnal	Yes	No	Yes	We believe this site is suitably placed to provide development towards the target of dwellings by 2038, being situated with an access to the A442 and adjoining developed land, the Telford Hotel and Golf Course. The land is well positioned with access to the highway on the eastern boundary adjoining land that has residential developed land. The land includes woodland which could be for community amenity use. This site is within easy reach of Halesfield employment opportunities and Telford schools and amenities plus within range of M54 motorway. The site is bounded on three sides by Sutton Hill residential, Telford Hotel and Golf Course plus the A442. A woodland can be planted on the southern boundary to define a limit to development
A0579	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.1	Yes	No	Yes	Land south east of Wem Industrial Estate, Saulton Road, Wem is a well located and fully deliverable site with an area of 3.259 ha. We believe this site is suitably placed to provide the development in the Key Centre of Wem being situated with an access off the B5056 and adjoining previously developed land and the development boundary. The land is well positioned with access to the highway on the southern boundary and is adjoining land that has already been developed. The land is well placed for the expansion of Wem in terms of its location to the A49. A smart new commercial development here would enhance the entry towards Wem from the North.
A0580	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Hanwood	Yes	No	Yes	This site is suitably placed to provide the development of 22 dwellings by 2038, being situated with an access off B488 and adjoining previously developed land and the development boundary, plus walking distance to the school, local amenities and playing fields. The land is well positioned with access to the highway on the western adjoining land that has already been developed. The recently constructed residential developments sold very quickly, proving the demand for this site. All infrastructure is available. The land is well placed for the expansion of Hanwood in terms of its location to the school and facilities. There will be no requirement for children and parents to walk on a footpath on the very busy main road (A488), as the school would be accessed via the much safer route. The land is also well placed for access to the village hall, playing fields and school via walking and therefore without vehicles.
A0581	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 DGN018	Yes	No	Yes	DGN018 is a fully deliverable site with an area of 0.64 ha. We believe this site is suitably placed to provide development in the Community Hub of Dorrington towards the preferred dwelling guideline to be determined by the Parish Council of 150 dwellings. The land is situated with an established excellent access to the A49 and adjoining recently developed land providing natural infill. Site DGN018 has achieved a sustainability rating of '-5', which is one of the better ratings compared to the other sites within Dorrington. The land is well positioned with the southern boundary adjoining the highway and the western boundary adjoining land that has recently gained residential planning permission. To the north and the east boundaries is an established boundary hedge providing natural screening.
A0582	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.1 WEM003	Not Specified	Not Specified	Not Specified	Agree with WEM003, this could be expanded to the west.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0578	B001	This parcel of Green Belt land situated on the A442 adjoining the Telford urban boundary close to the settlement of Sutton Maddock should be considered for residential development and to help overcome the objections to further growth in the Key Centre of Shifnal.	<p>Shropshire Council considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. This site would not satisfy the requirement for exceptional circumstances to justify the release of this land from the Green belt which would be contrary to the purposes of the Green Belt. The site is situated in the open Green Belt adjoining the urban area of Telford as a large built up area, it would encourage the merging of Telford with other settlement inset into the Green Belt and would result in an urban encroachment into the countryside and as such would affect the openness and permanence of the Green Belt.</p>	No
A0579	B001	Land south east of Wem Industrial Estate, Soulton Road, Wem should be considered for residential development.	<p>Noted. Shropshire Council considers that the proposed development strategy for Wem and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>	No
A0580	B001	The site should be considered for residential development	<p>Noted. Shropshire Council considers that the proposed development strategy for Hanwood and the existing commitments (including the existing allocation) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. It has also been informed by a proportionate and robust site assessment process has been undertaken, including consideration of this promoted site as part of a wider site promotion.</p>	No
A0581	B001	DGN018 should be considered for residential development.	<p>A Neighbourhood Plan is being progressed which covers the settlement of Dorrington. The Neighbourhood Plan will include the strategy for achieving the housing and employment guidelines for the proposed Community Hub of Dorrington.</p>	No
A0582	B001	Expand site WEM003 to the west	<p>Noted. Shropshire Council considers that the proposed development strategy for Wem and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0582	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	No	Not Specified	<p>The rationale for the stated 50% of housing meeting a prescribed housing mix is not set out. The requirement is considered to be overly restrictive and unjustified.</p> <p>With regard to use of Right Home Right Place Surveys, these represent only snapshots of need and the majority of Key Centres (focus for housing delivery) do not have surveys available. There is also a need for clarity about when such evidence is up to date.</p> <p>DP1 is considered to be overly prescriptive and will impact on the viability and marketability of residential schemes. As such it is requested that reference to a specific housing mix be removed from the policy. Wording should be added enabling a developer to put forward a case for a certain mix of units, based on evidence of the local market, local circumstance or other relevant issues.</p> <p>Nationally described space standards (NDSS) should only be required where the need is justified (as per footnote 46 of the National Planning Policy Framework (NPPF)). The Council's evidence, as set out within the Delivery and Viability Study (paragraph 8.6 and Appendices 6 and 7), is inconclusive in relation to the level of housing currently achieving the nationally described space standards (NDSS) and whether there is persistent significant under-delivery to provide a compelling need for NDSS. Impact on viability also unclear.</p> <p>Welcome recognition of the need to consider the cost of M4(2) and M4(3) requirements. However, the costs included in the Viability Assessment have not been informed by relevant local stakeholders and developers, they are simply derived from 'Housing Standards Review – Final Implementation Impact Assessment' and indexed to Dec 2019.</p> <p>When determining if specialist housing is appropriate within a new development, consideration should be given to locational factors, such as proximity to essential community services specifically for those who would occupy such specialist housing. Impact on viability also needs to be considered.</p>
A0582	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Not Specified	No	Not Specified	<p>The SLP draft requirements are not considered to be justified or consistent with national policy. In particular, on major housing sites brought forward by a single developer there is a real risk that this approach could slow down the delivery of housing. It is our experience that those seeking to self-build are not generally seeking a plot within a larger residential development, they would prefer a stand-alone plot. There is also the potential for conflict on larger sites between those seeking to self-build versus the requirements of a Design Code approved for the wider site. Those wishing to self-build and custom-build are unlikely to want to comply with a Design Code developed for a large housing development. It is also noted that the self-build register does not provide confirmation of the ability of registered parties to be able to deliver their own homes and this could result in uncertainty and delays to delivery of the full capacity of a site. This uncertainty is highlighted by the proposed inclusion of 2d of the policy. In accordance with the marketing requirements of 2d, several plots within a developed-out housing scheme could remain vacant for more than 2 years. If these plots are not acquired by a self-builder, then the main developer may need to re-commence construction works on site, which would have significant financial implications. As self-build and custom houses can only be occupied by the individuals or groups who actually build (or commission the building) of those specific units, such individuals are not generally acquainted with the wider development process. Therefore, entering into the numerous contracts for self-build construction would represent a significant burden to the developer of the wider land parcel, and potentially slow housing delivery on major sites. There are potential health and safety issues related to having 10 or more individual construction sites operating within a development site. It is maintained that the provision of such plots should be left to the discretion of the developer based on market trends and needs, which are liable to change over the plan period. It would be more appropriate to provide for self-build and custom-build housing through the delivery of small windfall sites</p>
A0582	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	No	Not Specified	<p>The policy aims to provide well designed, high quality affordable homes of the right type and tenure, is welcomed. However, the requirements set out in part 1 of the policy are considered to be inflexible. It is maintained that the number, size, type, tenure and distribution of affordable dwellings to be provided should be subject to negotiation with the applicant, dependent on recognised local housing need, specific site and location factors and development viability.</p> <p>Part 2 of the policy refers to the use of an overage clause in order to secure the potential for future contributions towards affordable housing, where a scheme's affordable housing provision has been reduced in accordance with a viability case demonstrating that a compliant level of affordable housing cannot be provided. No further clarity is included in the policy as to what parameters would be included in overage clauses.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0582	B002	<p>Part 2 of draft Policy DP1 relating to the unit size mix is considered to be overly prescriptive and may impact on the viability and marketability of residential schemes. It is requested that reference to a specific housing mix be removed from the policy. Wording should be added to Part 2 of draft Policy DP1 enabling a developer to put forward a case for a certain mix of units, based on evidence of the local market, local circumstance or other relevant issues.</p> <p>The introduction of NDSS into the SLP policy requirements is not considered to be justified by evidence of a persistent significant under delivery against NDSS in Shropshire. The costs of compliance with the NDSS needs to be fully understood in terms of the SLP viability.</p> <p>The costs involved in the adoption of the optional access standards is not fully justified by the evidence base for the SLP. As such Policy DP1 does not accord with paragraph 31 of the NPPF and should be removed from the SLP.</p> <p>The location of specialist housing should be based on proximity to specific facilities that future residential-dents of such housing would require.</p> <p>If parts 1-6 are retained, an additional part 7 should be included in policy DP1, stating that 'housing schemes which do not comply with the requirements sets out in 1-6 due to viability concerns but represent otherwise sustainable development will be considered where evidence is clearly presented and agreed by the Council'.</p>	<p>Noted. It is considered para's 2a/b of draft Policy DP1 provide an appropriate balance between ensuring new development will include an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) about housing mix requirements, and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand.</p> <p>Noted. The approach to nationally described space standards proposed within Para 3 of draft Policy DP1 is considered to positively respond to the evidence available within the Strategic Housing Market Assessment (SHMA) and other sources. Providing dwellings with sufficient internal floorspace positively contributes to the future occupier's ability to achieve a high-quality of life and is responsive to changing household requirements, by increasing the ability to include adaptations at a later date.</p> <p>It is recognised that sites of 50 or more dwellings will be diverse in nature and it is for this reason that a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors.</p> <p>This draft Policy was informed by the Viability Assessment undertaken to inform the draft Shropshire Local Plan. this is considered a proportionate and robust assessment.</p> <p>Shropshire Council does not consider it is appropriate or necessary to include the proposed text regarding non-compliance with the various requirements of draft Policy DP1.</p>	No
A0582	B003	<p>Requested Change: Policy DP2: Self-Build and Custom-Build Housebuilding, should be revised to address identified issues. Self-Build and Custom-Build houses should be encouraged on smaller sites (e.g. 10 units or below) which are more likely to be attractive to those seeking to self-build. Additionally, when carrying out 'Call of Sites' exercises, a question should be included asking for sites to be put forward which could specifically accommodate self-build and custom-build units. Again, these would generally be smaller sites.</p>	<p>Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position.</p> <p>It is considered that the proposed approach within draft Policy DP2, alongside other relevant policies relating to residential development in the draft Shropshire Local Plan, will effectively meet the diverse need for self-build and custom-build development. It is important to note that open market self-build and custom-build development is a form of open market residential development. It is also important to note that Shropshire is already delivering significant volumes of self-build plots, using a policy approach which is generally consistent in relation to small sites, whilst the proposed approach in relation to large sites creates an opportunity to complement this provision both in terms of numbers and types of plots, again to effectively meet the diverse need for self-build and custom-build development.</p>	No
A0582	B004	<p>Requested Change: Part 1 of Policy DP3 is considered to be inflexible and overly prescriptive in relation to the types and mix of affordable housing to be delivered. The policy should also include reference to discussions between the Council and applicant to reach the most appropriate affordable housing solution for individual sites, this should consider flexibility of the mix and types of affordable homes based on appropriate evidence provided.</p>	<p>Noted. Shropshire Council consider requirements identified within paras 1.c. to 1.f. of draft Policy DP3 are appropriate and provide certainty to all including the decision maker, development industry and local communities. The proposed tenure split effectively responds to evidence on affordable housing needs, as summarised within para 4.52 of the explanation to draft Policy DP3 of the draft Shropshire Local Plan. It also provides flexibility for alternative tenure splits where local need would support this.</p> <p>A Housing Supplementary Planning Document will support housing policies and provide further guidance.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0582	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	No	Not Specified	Part 1b. of DP11 states that all proposals for 10 or more dwellings will need to achieve a minimum of 19% improvement in the energy performance requirement in Part L of the 2013 Building Regulations. The costs for such measures are considered in the Local Plan Delivery and Viability Study and are taken from the 'Energy Cost of carbon Reduction in New Buildings' report (Centre for Sustainable December 2018). These costs have not been informed by local stakeholders and do not necessarily reflect local circumstances. Part 1c of the policy goes on to require all proposals for the formation of one or more dwellings provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources. Again, the costs of this requirement and the ability of specific sites to deliver on-site energy needs to be considered in terms of local circumstances. Policy 1d. strongly encourages all proposals for one or more dwellings and in particular those of 50 or more dwellings to: i. Achieve zero net-carbon emissions; ii. Maximise the use of on-site district heating and cooling systems, especially where these utilise renewable energy and iii. Maximise opportunities to connect to wider heating and cooling networks both for energy supply and export, especially where these utilise renewable energy These aims are considered to be extremely ambitious. It is highlighted that the Government's latest target is to bringing all greenhouse gas emissions to 'net zero' by 2050. The policy does not take into account that the national grid now generates more energy from zero carbon sources than from fossil fuels, a figure that is increasing due to the ability to generate electricity through large scale renewable energy facilities across the country. As such, in terms of increasing the use of renewable energy, it may be more efficient and cost effective for new development to plug into the national grid than for piecemeal energy generation measures to be installed on individual sites.
A0582	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Not Specified	No	Not Specified	Part 3 of the policy introduces the requirement for 10% Biodiversity Net Gain. It is noted that the Government's impact assessment accompanying the Biodiversity Net Gain strategy suggests an average cost in the region of circa £21,000 per hectare and that this is used in the assessment. However, this figure needs to be based on local data reflecting the biodiversity situation in Shropshire and the likely new habitats required. In particular, the implications of having to acquire additional land on which to provide some of a scheme's net gain needs to be fully understood in terms of land availability and cost.
A0582	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP15	Not Specified	Yes	Not Specified	It is noted that the proposed wording of the policy states that there is an 'expectation' to deliver 30sqm of open space per person and that 'consideration will be given to reducing this level of provision in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents'. The new policy wording will allow for wider site circumstances to be taken into consideration and for the notion of 'quality over quantity' to be realised, as set out in paragraph 4.158. Shropshire Council's recognition that the provision of open space should not be driven purely by mathematical calculation is welcomed
A0582	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP27	Not Specified	No	Not Specified	DP27.5 refers to residential and commercial developments being expected to maintain and improve the connectivity of mobile voice and data communications networks. Parts a-d of Policy DP27.5 are overly onerous for site developers. The role of providing and maintaining communications networks is one for the community-cation infrastructure companies and not one for site developers.
A0582	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	The SLP includes a housing requirement for Shropshire of 30,800 dwellings over the plan period, which Shropshire Council considers to provide flexibility to respond to changes in the Local Housing Need figure over the plan period. However, the additional allowance of 4,906 dwellings over the LHN for the entire plan period of 22 years, is considered to be extremely modest if Shropshire is to meet its wider aspirations for growth. As set out in the Economic Growth Strategy for Shropshire (2017-2021) the Council has a commitment and ambition to grow the local economy of the County through investment and an increase in productivity and diversification of the labour force. These economic ambitions require an increase in the housing requirement above the minimum LHN so that a lack of labour is not a constraint on realising the economic growth potential of the County. The 300ha of employment land required within the plan period is identified to help drive this growth. However, the provision of additional housing will also be key to promoting growth in the area and supporting the delivery of new employment. The current housing requirement in the adopted Local Plan is 1,375 dwellings per annum. The housing requirement in the emerging plan provides for only 25 dwellings per annum more (a 1.8% increase). This is not considered sufficient to support the economic growth being sought within the County.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0582	B005	Requested Change: The potential costs involved in the delivery of the measures set out in Policy DP11, as included in the Local Plan Delivery and Viability Study should be informed by local stakeholders and should reflect local circumstances. The benefits of using renewable energy provided by the wider national grid, as opposed to piecemeal onsite generation should be fully understood. Flexibility is required in the policy to address site specific issues.	The Council considers that this policy introduces effective and appropriate policy requirements for new development to contribute to reducing impact on climate change, whilst also ensuring compliance with national policy and legislation and ensuring the continued viability of development.	No
A0582	B006	Requested Change – The costs and full implications of requiring development to deliver 10% biodiversity net gain must be understood at a local level and considered in the Local Plan Delivery and Viability Study. Further guidance is required as to how such net gain could be provided off-site so as not to compromise the ability to make best use of a sustainable development site and to also provide truly effective biodiversity gains for the wider area.	A Whole Plan Viability Assessment has been undertaken to inform policy requirements with the intention of ensuring the viability and deliverability of the draft Shropshire Local Plan. Draft Policy DP12 has been subject to due consideration within this assessment. No change proposed.	No
A0582	B007	n/a	Support welcomed	No
A0582	B008	Requested Change – Part 5 of Policy DP27 should be removed as the provision and maintenance of such communication networks are the responsibility of the relevant infrastructure providers.	Shropshire Council is working to improve broadband connectivity across the County through its Connecting Shropshire programme to attract commercial superfast broadband infrastructure investment and to bring faster broadband to areas where it is not economically viable for commercial operators to provide these services. The purpose of these objectives for connecting Shropshire to the best electronic communications infrastructure into their business premises and homes is to ensure businesses, employees and residents can embrace and optimise the use of broadband in their everyday lives. Unless the development market also embraces these objectives in their development design schemes and build specifications through the provision of network infrastructure and fibre to premises technologies then the roll out of digital connectivity will not be achieved and Shropshire will struggle in its programme to move towards and achieve the broader objective of creating a zero carbon economy in the County.	No
A0582	B009	Requested Change – It is considered that the overall housing requirement identified in the SLP does not represent a boost to the supply of homes in the area, as is required to support the economic growth aspirations of Shropshire Council. A higher housing requirement should be considered by the Council.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. It is considered that an appropriate balance is achieved between the proposed housing and employment land requirements. It is important to note that the proposed employment land requirement needs to respond to numerous factors in addition to the proposed housing requirement, including: achieving key economic objectives of the strategic approach in Policy SP2, such as providing for the delivery of a growing and diverse labour force (including those which commute out of the County), and in turn supporting the delivery of an improving rate of economic growth and an increase in the productivity of the local economy; wider aspirations within the Economic Growth Strategy for Shropshire; the nature of employment development in Shropshire (including the proportion of an employment site that results in net employment floorspace); the need to off-set the re-use of existing employment land for other purposes; and the wider range of employment uses now being accepted in the draft Shropshire Local Plan. The proposed employment land requirement also incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan, where evidence indicates employment delivery opportunities are constrained. This reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0582	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Not Specified	No	Not Specified	The aim of transitioning to a zero-carbon economy is noted, as is the recognition in paragraph 3.29 of the explanatory text, that this is a very challenging target. Policy SP3 part 2 goes on to refer to integrating or supporting both on and off-site delivery of renewable and low carbon energy in accordance with the requirements of Policy DP12, as well as supporting district heating and cooling networks, and community energy generation schemes. It is stressed that the practicalities and cost implications of such policy requirements will need to be fully considered and incorporated into the SLP Delivery and Viability Study. The Shropshire Delivery and Viability Study (July 2020) recognises that building to increased standards would require higher costs (paragraph 8.18) and sets out several scenarios for potential build cost implications. The Study needs to take account of local circumstances and up to date information from developers in the Shropshire area and appropriate industry bodies, to ensure that it reflects a true assessment of costs involved in the proposed climate change measures and how this effects site viability.
A0582	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	Yes	Not Specified	The strategy for managing housing development set out in Policy SP7 is supported. In particular, the reference in SP7.4 to considering additional housing development outside of the identified settlement development boundaries when necessary, provides flexibility to enable the delivery of Shropshire's identified housing requirements. As noted in the policy, there may be circumstances where the development guidelines for a particular settlement are unlikely to be met. This may be due to site specific constraints being identified on a site following its allocation for development. Such constraints may limit the level of market housing that can be delivered on that particular site and as such there will be a demonstrable risk to the delivery of that site allocation within the plan period. In such circumstances, it is only appropriate that other suitable sites are considered to accommodate the identified housing need for that settlement. As noted in the policy, those additional sites may require land that is currently outside of the settlement boundary. This flexible approach will help ensure housing is delivered in accordance with the identified requirements of the Local Plan period and reflects the NPPF's presumption in favour of sustainable development. As set out in paragraph 3.50 of the SLP, the development boundary of a settlement is a mechanism to positively manage development. This approach is welcomed.
A0582	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Not Specified	Yes	Not Specified	Part 3 of the economic growth strategy set out in SP12 is supported. It is agreed that the Principal Centres and Key Centres, such as Wem, should be the focus for economic growth and investment to ensure Shropshire's continued prosperity. Many of the Key Centres identified in the SLP are critical economic and social hubs for the wider rural communities of Shropshire. As such focusing the delivery of housing within such areas is essential, while also enabling a controlled level of housing in smaller Community Hubs and Community Clusters.
A0583	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Yes	No	Yes	Support the aim of the delivery of self-build or custom build housing under DP2. Note the policy does not seek provision as an absolute requirement and, compared to the Regulation 18 version (August 2020), the necessary marketing period has been reduced from 36 to 24 months. Nevertheless, remain of the view that a 24 month period represents a significant length of time, particularly in the context of small-medium scale development and this could extend beyond actual completion of development works associated with the main site delivery. A reduced marketing period of 18 months is considered more appropriate to account for the above concern. In turn, DP2 does not identify a 'return mechanism' for sites should uptake of plots not come forward within the relevant marketing period. This should be address in line with commentary in the following section.
A0583	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2	Yes	No	Yes	The fourth paragraph relating to SHM031 is incorrect and must be corrected. As worded, this paragraph wrongly refers to a sewer, its implication upon development and seemingly a resulting assessment required of the Sewage Pumping Station to establish improvement requirement. The Estate, as Landowner, submitted a Concept Masterplan and Vision Document (CM&VD) to previous stages of the Local Plan process, including the Regulation 18 consultation (August 2020). This identifies a utility easement which is associated with a gas pipe and not sewer infrastructure. The CM&VD identified this utility easement and as a result demonstrates the ability of SMH031 to deliver, through a considered masterplan, the capacity of 60 dwellings in line with the site allocation. In view of the drafting error, it is appropriate to delete the final (fourth) paragraph associated with the SMH031 allocation.
A0583	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	Yes	Yes	Recognise the sustainable merits of a balanced approach to development. The Draft Shropshire Local Plan identifies the role of the higher order and most sustainable settlements but also the importance of the rural areas and the part these settlements can continue to play in delivering housing and, in turn, providing for vitality to communities. Owing to the existing service offer (Hierarchy of Settlement Paper, August 2020), maintain support for the identification of St Martins as a Community Hub settlement under schedule SP2.2. In turn, it is appropriate that Bullet 6 of Policy SP2 enables sustainable development at such rural service centres. This principle is clearly identified by para 78 of the National Planning Policy Framework (NPPF).
A0583	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Yes	Yes	Yes	The policy criteria of Policy SP8, concerning management of development in Community Hubs are noted, as relevant specifically to St Martins. The 3 policy criteria (including sub sections) provide a framework under which future development proposals can be appropriately considered.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0582	B010	Requested Change – Further consideration is needed in relation the deliverability and viability of the measures set out. This must be reflected in the Delivery and Viability Study supporting the SLP and supported by up to date local evidence from developers and industry bodies. The first sentence of SP3.2 should be reworded to state ‘Integrating or supporting both on and off-site delivery of renewable and low carbon energy, where viable, including by....’	A Whole Plan Viability Assessment has been undertaken to inform proposed policy requirements, including those related to energy efficiency, with the intention of ensuring the viability and deliverability of the draft Shropshire Local Plan. This is considered a proportionate and robust assessment. The wording of draft Policy SP3 is considered appropriate and consistent with the wider draft Shropshire Local Plan.	No
A0582	B011	n/a	Noted.	No
A0582	B012	n/a	Noted.	No
A0583	B001	Bullet 2d of Policy DP2 to be replaced with: ‘When marketed, be serviced, available for purchase and ready for development by a Self or Custom-Builder. This marketing should occur for at least 18 months at a fair plot calculation and in accordance with a marketing strategy to be approved by Shropshire Council.’ Additional text added to the effect: Should interest not be forthcoming through the 18 month marketing period then plots are considered to form part of the overall development and can be delivered by the Developer without the Self of Custom Build requirement.	As documented within the proposed explanation to draft Policy DP2, the SHMA concludes that over the proposed Plan period, around 2,400 applications will be made for inclusion on the Self-Build Register. Although not directly comparable, this equates to around 9% of the calculated local housing need. As such it is considered appropriate to encourage larger development sites to make 10% of dwellings available for Self-Build developers, where there is an identified need on the Self-Build Register. Draft Policy DP2 includes a 24 month marketing timescale, which is considered appropriate.	No
A0583	B002	Owing to a technical inaccuracy in respect of the allocation wording, as explained above, the following text should be deleted from forming commentary alongside SMH031 on page 249 of the Regulation 19 document. ‘The site is crossed by a sewer, therefore protection measures in the form of an easement width or a diversion of the pipe would likely be required which may impact upon the housing density achievable on site. An assessment of the Sewage Pumping Station (SPS) would need to be undertaken to establish whether improvements are required.’	A minor modification to Schedule S14.2(i) is proposed to SMH031 to recognise the presence of a utility in the site	Yes
A0583	B003	n/a	Noted.	No
A0583	B004	n/a	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0584	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 SHR173	Yes	No	Yes	There is an absence in the LPR of an objectively assessment requirement for C2 / care provision and effective strategy to meet this need. Whilst we agree with the focus on Shrewsbury to deliver housing and economic development, we disagree that the housing needs of the town will be met as currently set out Policy 16.1. In respect of housing there is an absence of identified sites for specialist age appropriate accommodation and those in need of care. Specifically identified sites are required to accommodate this specialised form of development in a manner which meets the care community financial model as distinct from normal housing development. Policy SP10 does not include specific reference to specialist accommodation for the older population. The Hencote proposal has been generated in response to ongoing dialogue and engagement, but its key overall advantage compared to anything Shropshire has encountered before is that it provides a flexible range of accommodation with graduated access to supporting care, social, recreational, therapy and well-being facilities, within a safe setting, offering access to open space, wildlife and other interests
A0584	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	"Shropshire's Character"	Yes	No	Yes	There is an absence in the LPR of an objectively assessment requirement for C2 / care provision and effective strategy to meet this need. Para 2.19 states that the DSLP will seek to provide a sustainable pattern of growth, responding to the needs and functions of Shropshire's settlements. This is the correct approach, but all needs and functions (including for an aging population) should be included in this provision. The ageing population and its needs demand specific attention in this Plan, which is lacking. The ageing population and its needs warrant more emphasis in the Introduction and analysis as they comprise a key issue for this Local Plan. As with many local plans, the DSLP refers to the issue of an ageing population but does not then set out a specific and effective policy approach to deal with the matter going forward. For the Plan to simply say that elderly accommodation will form part of general housing allocations is unrealistic and experience shows that it simply will not happen. Housebuilders will do no more than include an occasional care home in urban extensions, which is not enough. The ageing population should form part of the Introduction.
A0584	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Yes	No	Yes	There is an absence in the LPR of an objectively assessment requirement for C2 / care provision and effective strategy to meet this need. There are five key reasons for major concern about the shortfall in retirement and care housing, all of which support our representations to this Local Plan: First, the rapidly increasing elderly portion of the UK population, which is an even greater feature in the Shropshire population, rising swiftly and significantly over future years. Second, increasing under-occupation of the housing stock caused by a rapidly ageing population has created a dysfunctional housing market. First time buyers find it difficult to get on the housing ladder and families find moving to larger homes expensive. Older households are only 40% to 60% efficient based on space usage, whereas space is at a premium in younger households. Third, far too few homes are being built that cater for older people, providing opportunities to down size and / or with access to current or later care. The vast majority of homes built are not designed for retirement living or downsizing. Elderly persons housing has only accounted for about 125,000, or 2%, of all new homes built since 2000, but each year around 700,000 people turn 65 years of age. Fourth, the net result is that the number of households will continue to grow at a faster rate than the population and average household size will continue to reduce, resulting in increasingly inefficient use of the housing stock. Without change, the number of 'surplus' bedrooms will grow to over 20m by 2040, 60% of which will be in older persons' households. Fifth, whilst care homes can cater for people with high needs, the provision of age appropriate housing, with flexible access to communal services and personal care, must become part of mainstream housing policy. This should be integrated with tackling the social and healthcare needs of an ageing population.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0584	B001	<p>The Plan could include a criteria based policy establishing the considerations to be applied to site identification and defining the key scheme content including the range of supporting facilities and levels of care, as set out in response to the Residential Mix section of the Plan. A proposed care community on SHR173 will meet and comply with the objectives and policies set out in the LPR to address the need for accommodation for the older sector of the population, and will do so in an effective manner. It will deliver results, whereas the policies as currently written will not, meaning the Plan as drafted is not sound.</p> <p>Land at Hencote located adjacent to the Council's proposed SHR173 housing site, should be allocated for a Care Community Use Class C2. Supporting text explaining the allocation and differentiating it from ordinary housing should be included.</p>	<p>It is considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically:</p> <ul style="list-style-type: none"> <li>-Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings.</li> <li>-Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people.</li> <li>-Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation. No change proposed</li> </ul>	No
A0584	B002	<p>Recommend and request a more specific reference in the Introduction on the Plan's approach to later living and care accommodation, addressing the overriding need for specialised accommodation for the expanding older sector of the population, setting out the numerical requirement, and later in the Plan to include a policy approach to delivering appropriate accommodation in the right locations, including specific retirement living and care communities, and the allocation of suitable sites for this. At present, the LPR recognises the need for care and later living, but fails to provide realistic policies to secure its delivery. It falls short of meeting and addressing the national need (in fact the national crisis) identified by Government, as set out starkly in the independent CASS report and other assessments of need across the UK. It is therefore unsound. Our related representations include a specific analysis of the need in Shropshire, which is calculated by expert consultants in this field. It is larger and even more compelling than the figures produced in the Local Plan (see later representations). The need in Shropshire is greater than the national position, due to the proportion of Shropshire's total population in the elderly category being significantly higher than the national average. The need is more urgent locally than nationally and it warrants immediate and clear attention, enumerating the units required annually to address the requirement.</p>	<p>It is considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically:</p> <ul style="list-style-type: none"> <li>-Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings.</li> <li>-Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people.</li> <li>-Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation.</li> </ul>	No
A0584	B003	<p>The allocation of sites for specialised accommodation is required in the form of purpose built and managed care communities to deliver a range of accommodation incorporating staged, flexible and responsive levels of supporting healthcare and well-being. Suitably located sites should be allocated for this type of development, providing managed facilities that cater for older people's care and related needs and requirements as they evolve over time. These are distinct from market housing sites and will differ in their character and location from land that is suitable for market housing. Alternatively, a criteria based policy should be included in the plan setting out appropriate criteria for such sites to be identified and brought forward. A highly suitable location is that proposed by us on behalf of the landowner at Hencote vineyard and winery, for a high quality specialised care community adjacent to the vineyard, still retaining the vineyard and its openness. This site is adjacent to the proposed SHR 173 housing allocation, and located within the line of the North West Relief Road.</p> <p>In order for the Draft Shropshire Local Plan to be found sound, the identified needs of the older population must be met with a justified, effective strategy consistent with national policy – expecting strategic housing sites to deliver the quantum of specialist accommodation for the older population to achieve this is not realistic and is unsound.</p>	<p>Noted. The Local Plan Review is informed by a Strategic Housing Market Assessment (SHMA) which is considered proportionate and robust evidence. The SHMA indicates that growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the proposed Local Plan period from 2016 to 2038. It also identifies a specific need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision.</p> <p>It is considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically:</p> <ul style="list-style-type: none"> <li>-Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings.</li> <li>-Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people.</li> <li>-Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation.</li> </ul>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0584	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	No	Yes	There is an absence in the LPR of an objectively assessment requirement for C2 / care provision and effective strategy to meet this need. SP2 states that it will 'support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community.' However, no further detail or clarity provided on how or where this might be achieved. The Plan does not quantify the number of specialised elderly person and care units required on an annual basis. The updated Standard Methodology released by the Government in December 2020 indicates an Indicative Local Housing Need of 1,177 per year for Shropshire. In addition to meeting the compelling need for specialised elderly persons accommodation and care, the delivery of purpose-built housing for the older population in dedicated retirement and care communities will facilitate the 'freeing up' of existing dwellings which will contribute towards meeting this identified housing need. The issue needs to be more comprehensively and accurately addressed in the strategy section of the Plan and either a number of specific sites should be allocated, or the Plan should have a criteria based policy setting out the factors against which such schemes should be assessed, and listing the facilities they should provide.
A0585	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 BRD030	Not Specified	No	Not Specified	BRD030 is not considered to be fully justified. It is considered that Shropshire Council has not fully taken the reasonable alternatives into account. The owners of Site STC003 are willing to promote this site for 100% affordable housing (potentially delivering c.200 dwellings) whilst also delivering low or even zero carbon development. The fact remains that Shropshire Council has already acknowledged the presence of exceptional circumstances for altering Green Belt boundaries at Stanmore through proposing to allocate 11.4ha employment land adjacent to the Stanmore Industrial Estate for employment purposes (S3.1(ii) Sites P58a and STC002). There is an therefore a real and tangible opportunity to capitalise on the sustainability benefits of this employment land allocation and the presence of existing employment opportunities through creating a new sustainable community in this location. strategic development in Bridgnorth should be directed to the east of the settlement, as previously proposed. Site BRD032 is shown to be better performing than Site BRD030 in the SA. Comprehensive strategic mixed use development in this location, incorporating Site STC003, will improve connectivity to locally important Stanmore Industrial Estate. Development to the east of Bridgnorth will also assist with rebalancing the growth of Bridgnorth, which has been focused to the west of the settlement during recent decades, whilst also offering good connectivity from new development at Bridgnorth to the Black Country conurbation.
A0586	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	No	No	Not Specified	No assessment of the impact of Right to Buy on the supply and pool of affordable housing has been undertaken, particularly in less affordable settlements like Shifnal.
A0586	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	No	No	Not Specified	No allowance is made for reserve sites to meet any shortfall in housing delivery or an increase in affordability issues in locations such as Shifnal (the pandemic has already impacted on house prices in commutable rural locations, worsening affordability), which has the second words lower quartile affordability ratio and worst median affordability ratio in the County.
A0586	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	No	No	Not Specified	No allowance is made for reserve sites to meet any shortfall in housing delivery or an increase in affordability issues in locations such as Shifnal (the pandemic has already impacted on house prices in commutable rural locations, worsening affordability), which has the second words lower quartile affordability ratio and worst median affordability ratio in the County. The housing white paper and changes to the planning system consultations referenced.
A0586	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	No	No	Not Specified	Draft Policy SP11 is unsound. Consider insufficient safeguarded land has been identified to meet the longer term needs of Shifnal, allowing flexibility and opportunity for a choice of potential allocation sites in future, ensuring the longer term sustainability of the Local Plan or achieving key aspirations to improve the Green Belt. This is a significant error of the site assessment process and will likely result in the need for a further Green Belt Review at the end of the proposed Plan period, contrary to para 139 of the National Planning Policy Framework. Consideration of compensatory improvements to the environmental quality and accessibility of the remaining Green Belt, as required in the NPPF and National Planning Practice Guidance when undertaking the site assessment and identification process has been insufficient.
A0586	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	New Policy	No	No	Not Specified	Consider more flexibility should be built into the Plan through the inclusion of Reserve Sites which would enable the Council to respond to any shortfall in housing delivery. See wider representations.
A0586	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S19	No	No	Not Specified	This is a mainly greenfield site that will deliver a limited development in a location poorly served by existing facilities, being locationally remote. Technical documents provided to the Council by the MOD in relation to Clive Barracks, Tern Hill have not been published, meaning there is a lack of transparency. Timescales for release pushed back from 2022 to 2025, perhaps two defence reviews away. Given recent changes to the list of disposal sites, consider more flexibility should be built into the draft Shropshire Local Plan through inclusion of reserve sites, which would enable response to housing delivery shortfalls.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0584	B004	The issue of housing for the elderly and related care is a very serious and pressing matter for Shropshire. It receives only a passing reference in the Strategy section of the Plan and should be addressed more substantively in this section as a key social, healthcare and housing challenge. A clear policy approach is requested elsewhere in relation to the Residential Mix section of the Plan, to either allocate suitable sites for specialised (Use class C2) accommodation or for a criteria based policy to facilitate the delivery of such development on appropriate sites and subject to the necessary range of supporting healthcare and other facilities. This includes a specific proposal to develop a care community on land at Hencote vineyard, to be added to the current Local Plan allocations in order to provide a specialised form of combined care and housing development, distinct and differentiated from general market housing in direct response to the Plan's identified need (Use class C2), as set out in our other representations (these representations should be read together).	The need for accommodation for older people is assessed within the Strategic Housing Market Assessment. Specifically, the SHMA indicates growth in the number of older persons' households is a key feature in the population and household change projected to occur in Shropshire over the proposed Plan period. It also identifies a specific need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision. It is also considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically: -Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings. -Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people. -Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation.	No
A0585	B001	It is contended that Shropshire Council should allocate land to the east of Bridgnorth at Stanmore, incorporating STC003.	Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken, which included consideration of an appropriate range of factors used to identify constraints and opportunities.	No
A0586	B001	Assess the impact of Right to Buy on the supply/pool of affordable housing.	Affordable housing need in Shropshire has been calculated within the Strategic Housing Market Assessment (SHMA) which is considered an appropriate and robust assessment. This calculation of affordable housing need includes consideration of units to be taken out of management, including demolitions, sales/transfers to other RSLs, tenant's right to buy, other sales and loss of affordable shared equity housing.	No
A0586	B002	Include an allowance for reserve sites within the housing land supply, in locations such as Shifnal.	Noted. Shropshire Council considers it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. Draft Policy SP7 and other relevant policies provide the policy mechanism to respond to circumstances where the housing guidelines for particular settlements appears unlikely to be met over the proposed Plan period, or where there are specific considerations set out in the Settlement Policies. As such it is not considered necessary or appropriate to include a reserve site policy.	No
A0586	B003	Include an allowance for reserve sites within the housing land supply, in locations such as Shifnal.	Noted. Shropshire Council considers it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. Draft Policy SP7 and other relevant policies provide the policy mechanism to respond to circumstances where the housing guidelines for particular settlements appears unlikely to be met over the proposed Plan period, or where there are specific considerations set out in the Settlement Policies. As such it is not considered necessary or appropriate to include a reserve site policy.	No
A0586	B004	More safeguarded land should be identified at Shifnal. Consider capacity for compensatory improvements to the Green Belt within the site assessment process.	Noted. Shropshire Council considers that an appropriate amount of safeguarded land has been proposed for Shifnal. This is considered sufficient to ensure that Green Belt boundaries will not need to be altered at the end of the plan period. Proposed allocations and proposed safeguarded land have been informed by a proportionate and robust site assessment process, this included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt and the ability to achieve compensatory improvements to the remaining Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances and compensatory improvements to the remaining Green Belt are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No
A0586	B005	Consider that more flexibility should be built into the Plan through the inclusion of Reserve Sites which would enable the Council to respond to any shortfall in housing delivery. See wider representations.	Noted. Shropshire Council considers it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. Draft Policy SP7 and other relevant policies provide the policy mechanism to respond to circumstances where the housing guidelines for particular settlements appears unlikely to be met over the proposed Plan period, or where there are specific considerations set out in the Settlement Policies. As such it is not considered necessary or appropriate to include a reserve site policy.	No
A0586	B006	Provide greater flexibility through identification of reserve sites, in the event that Clive Barracks, Tern Hill does not come forward when anticipated.	Shropshire Council considers that the proposed development strategy for Clive Barracks, Tern Hill is appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken. Shropshire Council also considers it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. The draft Shropshire Local Plan presents information on trajectories for the development of these proposed allocations, informed by discussions with and submissions from the relevant site promoters.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0586	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Evidence Omissions	No	No	Not Specified	<p>There are a number of inconsistencies, alterations and omissions contained within the Stage 2 and 3 site assessment process (and its associated evidence base) which has informed proposed site identifications as such this process, proposed identification of SHF034, the draft Shropshire Local Plan and associated Sustainability Appraisal are not robust, consistent with the National Planning Policy Framework (NPPF) are unsound and should be reviewed.</p> <p>No relevant scoring criteria is included for Sustainability Appraisal Objective SO5 and SO6 within stage 2a of the site assessment for the preferred sites or strategic sites consultations (subsequently included within the next Regulation 18 consultation), no explanation for this omission was made. Would also question whether criteria now included meets the requirements of the Sustainability Objectives SO5 and SO6 as set out within the Sustainability Appraisal.</p> <p>Stage 2a assessment of sites within the assessment process for Shifnal and Strategic Sites are inconsistent with their scoring:</p> <ul style="list-style-type: none"> <li>-SHF034 incorrectly scored for having a tree preservation order within or on site boundary in the Shifnal assessment.</li> <li>-SHF034 incorrectly scored for proximity (480m) of a primary school, children's playground outdoor sports facility and amenity green space within the Shifnal assessment.</li> <li>-SHF034 incorrectly scored for proximity (480m) of a GP surgery within the Strategic Sites assessment (due to exclusion of land north of the railway line).</li> <li>-SHF034 incorrectly scored for being all/part in flood zones 2 or 3 in the Shifnal assessment.</li> <li>-SHF034 incorrectly scored for being wholly/partly brownfield land (SHF034 excludes land north of the railway line and the proposed masterplan does not involve redevelopment of Lodge Hill Farm) in the Strategic Sites assessment.</li> <li>-SHF035 is incorrectly scored for proximity to a primary school and children's playground in the Shifnal assessment.</li> <li>-SHF035 is incorrectly scored for proximity (480m) of an outdoor sports facility and amenity green space, in both the Shifnal and Strategic Sites assessments.</li> </ul> <p>With these errors rectified, SHF035 achieves -4 (Good) and SHF034 achieves -5 (Good). As such SHF034 is more sustainable, also born out when considering the sustainability credentials of each site.</p> <p>Also consider amendments to criteria should be made to reflect best practice, including changing walking distance to 800m; include additional criteria about quality of walking routes; accessibility for cyclists; a site level analysis of the Green Belt, whilst still drawing on past conclusions, would create a more robust assessment; more refined approach to landscape and visual analysis (define between medium, medium-low and medium-high; consider spatial relationship between proposals to consider combined impacts/benefits; consider non-designated heritage; and consider potential heritage benefits.</p> <p>Studies referenced in stage 3 of the site assessment have not been published, neither has background evidence or submissions by site promoters. This is not robust and does not allow a full consideration of the Assessment process and assumptions utilised.</p> <p>Detailed commentary on limitations of elements of the evidence base informing the site assessment provided, also specifically comparing sites SHF034 and SHF035 within appendix to the representation.</p> <p>Concerned evidence submitted in support of site SHF035 has not been considered.</p> <p>Failure to disclose evidence upon which SHF034 is proposed as safeguarded land (highway strategy for Shifnal, evidence around the proposed by-pass and justification for no longer pursuing, site promoter documents, management of flood risk, ecological impacts - Freedom of Information Requests appended to representation) undermines credibility of the decision making process, deliverability of SHF034 and soundness of the draft Shropshire Local Plan's evidence base. If this has occurred in Shifnal, not inconceivable to assume it has happened elsewhere.</p> <p><u>Consideration of compensatory improvements to the environmental quality and accessibility of the remaining Green Belt, as required in the NPPF and National Planning Practice</u></p>
A0586	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3 / SO6	Not Specified	No	Not Specified	<p>No relevant scoring criteria is included for Sustainability Appraisal Objective SO6 within stage 2a of the site assessment for the preferred sites or strategic sites consultations (subsequently included within the next Regulation 18 consultation), no explanation for this omission was made. Would also question whether criteria now included meets the requirements of the Sustainability Objectives SO6 as set out within the Sustainability Appraisal.</p> <p>Consider the draft Shropshire Local Plan, its Sustainability Appraisal and evidence base give insufficient consideration to the climate emergency declared by Shropshire Council.</p>
A0586	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21	Not Specified	No	Not Specified	<p>Fully support underlying principles of draft Policy S21 and its development growth objectives. Identifying RAF Cosford as a 'strategic site' and removing it from the Green Belt will support its long-term sustainability and transformation into a Centre for Excellence (delivering a flexible, affordable, modern and effective technical training centre which meets current and future UK Armed Forces needs). This will also support the Council's economic growth strategy by attracting more high-skilled people into the County.</p> <p>However, consider the proposal is currently 'unsound', unsustainable, fails to address Sustainability Objectives (SO5 and SO6) and is contrary to the Climate Emergency due to failure to identify adequate well located (cycle/walk to work) housing land to support expansion and provide alternatives to RAF Base housing for Service Personnel, Retiring Service Personnel and Civilian Staff (the site itself only provides accommodation for those in active service or on contract to the MOD) - retaining and growing a skilled workforce (supporting the Council's Economic Growth Strategy). Lack of sufficient housing will also put pressure on the important gap between RAF Cosford and Albrighton and exacerbate local affordability issues.</p> <p>Land at Newport Road, Cosford (CFD003), located next to RAF Cosford, is suitable/available/achievable (including viable), represents a sustainable opportunity for delivery of housing to support the role of/co-located with employment at RAF Cosford (site promotion material appended to this representation), and is located within the M54 strategic corridor. Disappointed the site is not assessed on its own merits. There are no major constraints to the development of this site and any identified can be mitigated. The site could be tailored to deliver open market/affordable dwellings aimed at services personnel, retired service personnel and civilian support staff (housing would also be on the M54 corridor and could potentially assist in meeting cross-boundary need); offers opportunities for wider linkages into the existing transport network (pedestrians, cyclists and vehicles); increase publicly available open space/Green Infrastructure; enhance biodiversity; enhance the landscape framework; the site performs a more limited contribution to the Green Belt than other areas around RAF Cosford; and its development would reduce pressure on Albrighton/the gap between RAF Cosford and Albrighton. Part of the site could be safeguarded for development beyond the proposed Plan period, avoiding need for successive Green Belt Reviews.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0586	B007	<p>Review the site assessment process.            SHF035 should be identified as a reserve housing site or            SHF035 should replace SHF034 as the preferred safeguarded land for future housing in Shifnal or            SHF035 should be identified as additional safeguarded land for future housing need in Shifnal.</p>	<p>Shropshire Council considers a proportionate and robust evidence base has been prepared to inform the Local Plan Review. Shropshire Council also consider that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Comments on the Sustainability Appraisal (SA) noted. Proposed changes to SA would have no material effect so are not considered necessary.</p>	No
A0586	B008	<p>Review the site assessment process and consideration of the Climate Emergency.</p>	<p>The omission was made in error and corrected in later appraisals. As such the Council considers that the SA and site assessment process is legally compliant, appropriate, robust and proportionate. No change proposed.</p>	No
A0586	B009	<p>Amend draft Policies S21 and SP11 to remove from the Green Belt and allocate for residential development (or safeguard) Land at Newport Road, Cosford (CFD003) to support the strategic growth objectives of RAF Cosford.</p>	<p>Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site. This will of course complement and be complemented by the wider proposals within the draft Shropshire Local Plan.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0586	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3 / SO5	Not Specified	No	Not Specified	No relevant scoring criteria is included for Sustainability Appraisal Objective SO5 within stage 2a of the site assessment for the preferred sites or strategic sites consultations (subsequently included within the next Regulation 18 consultation), no explanation for this omission was made. Would also question whether criteria now included meets the requirements of the Sustainability Objectives SO5 as set out within the Sustainability Appraisal. Consider the draft Shropshire Local Plan, its Sustainability Appraisal and evidence base give insufficient consideration to the climate emergency declared by Shropshire Council.
A0586	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SHF034	No	No	Not Specified	The site assessment process utilised to identify SHF034 as safeguarded land is inappropriate and unsound. More sustainable sites exist. The site is located within the gap between Shifnal and Telford, which is inconsistently considered within the site assessment process. Failure to disclose evidence upon which SHF034 is proposed as safeguarded land (highway strategy for Shifnal, evidence around the proposed by-pass and justification for no longer pursuing, site promoter documents, management of flood risk, ecological impacts - Freedom of Information Requests appended to representation) undermines credibility of the decision making process, deliverability of SHF034 and soundness of the draft Shropshire Local Plan's evidence base. If this has occurred in Shifnal, not inconceivable to assume it has happened elsewhere. Consider SHF0034 has not been fully considered in terms of the tests of deliverability, likely to lead unsustainable, poorly located and remote housing (contrary to the climate emergency); an under delivery of housing and particularly affordable housing; and will necessitate an early Green Belt Review contrary to the provisions of the NPPF. Understand SHF034 is proposed as it can deliver a bypass of Shifnal, however deliverability and impact on congestion not assessed when proposed, contrary to the requirement that proposed allocations/identified sites should be demonstrated to be achievable, suitable and available. The full extent of the bypass has now been discounted (required land no longer included) as it is not deliverable, removing the premise for this site and as such consider the location of new housing in Shifnal should be revisited.
A0586	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SHF035	No	No	Not Specified	SHF035 has not been properly considered within the site assessment process. Concerned evidence submitted in support of site SHF035 has not been considered. Greenfield sites such as SHF0035, provide potential to deliver more affordable housing than more technically constrained Greenfield sites and Brownfield land with high infrastructure and/or remediation costs. SHF035 would be an exemplar in sustainable development practises, aligning itself to achieve all 17 of the United Nations sustainable development goals and helping to overcome the global challenges we face, can deliver sustainably located housing adjacent to the proposed employment allocation (would enhance performance and suitability/achievability/deliverability of the proposed employment allocation, through enhanced accessibility from Wolverhampton and the south side of Shifnal (key to its success)). Submitted evidence (including a Site promotion/vision document and exhibition boards, access/transport appraisals, Green Belt appraisal, Landscape and Visual appraisal, Supplementary Green Belt & Landscape Appraisal, Heritage appraisals, Ecology appraisals and Flood Risk appraisals appended to this representation) demonstrates SHF035 is subject to no technical constraints and provides benefits (many not associated with SHF034 or other locations), including: accessibility by a range of means (delivery of a footpath/cycle link to the town centre/train station and through the site; improved public transport; highway improvements including improved/new road link from A454 to the proposed employment allocation and J3 of the M54 (reducing impacts/traffic in and enhancing the town centre) and improvements to the A464/Upton Lane junction), proximity to services and employment (and potential for on-site services), ecologically unconstrained, protection/enhancement of the Old Windmill, 22ha of open space, re-purposing bio-sterile fishing lakes to delivery biodiversity net gain, avoidance of the Green Belt gap between Shifnal and Telford, avoiding know area of flood risk, housing within the M54 corridor (potential to contribute to meeting unmet cross-boundary need), and ability to make efficient use of land. Cumulative benefits of allocating/safeguarding SHF035 have not been considered, particularly in terms of its relationship with employment allocations SHF18b and SHF18d and to development currently underway to the west which enables the provision of direct and dedicated green cycle and footpath accesses straight into the town centre. Consider site SHF035 performs better than SHF034 (evidenced through submission of a range of site assessments and technical reports) and should be safeguarded for future development instead. Alternatively more land could be safeguarded to provide greater choice and flexibility in the future, particularly given the 'need' and 'affordability' challenges surrounding Shifnal and having regard to likely Green Belt review restrictions as a consequence of the current White Paper.
A0586	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SHF018b/SHF018d	No	No	Not Specified	SHF035 can deliver sustainably located housing adjacent to the proposed employment allocation (would enhance performance and suitability/achievability/deliverability of the proposed employment allocation, through enhanced accessibility from Wolverhampton and the south side of Shifnal (key to its success)). Cumulative benefits of allocating/safeguarding SHF035 have not been considered, particularly in terms of its relationship with employment allocations SHF18b and SHF18d and to development currently underway to the west which enables the provision of direct and dedicated green cycle and footpath accesses straight into the town centre.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0586	B010	Review the site assessment process and consideration of the Climate Emergency.	The omission was made in error and corrected in later appraisals. As such the Council considers that the SA and site assessment process is legally compliant, appropriate, robust and proportionate. No change proposed.	No
A0586	B011	Review the site assessment process. SHF035 should replace SHF034 as the preferred safeguarded land for future housing in Shifnal.	Shropshire Council considers that the proposed development strategy for Shifnal and the existing and proposed allocations and identification of 'safeguarded' land contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The council's evidence base has been available for the public to see throughout the process, with additional information being added to the Council's website as and when prepared. There is a clear distinction between the Council's evidence base, and the evidence of site promoters, which is not the Council's evidence base and will only be submitted to the EiP if it has formed part of a duly made representation. Decisions on proposed site allocations, and to the identification of proposed additional 'safeguarded' land have been subject to a robust and transparent site assessment process, captured within the Council's Sustainability Appraisal process in order to reduce any concern about a 'paper chase'. In the case of Shifnal this process has been further supported by an Exceptional Circumstances report, detailing the Council's rationale for proposing to release Green Belt land for new allocated sites and additional 'safeguarded' land. The objectors concerns with regard to the transparency of the process are therefore not considered to accurately reflect the Council's plan making process. The proposed 'safeguarded' land is not a proposed allocation; this is made very clear in Policy S15.1. The 'safeguarded' land is specifically identified for potential development beyond 2038 in order to provide a degree of certainty. However, any future allocation of this site will need to come through a review of the Local Plan and a further site assessment process. No change proposed.	no
A0586	B012	Review the site assessment process. SHF035 should be identified as a reserve housing site or SHF035 should replace SHF034 as the preferred safeguarded land for future housing in Shifnal or SHF035 should be identified as additional safeguarded land for future housing need in Shifnal.	Shropshire Council considers that the proposed development strategy for Shifnal and the existing and proposed allocations and identification of 'safeguarded' land contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The Council's evidence to support the release of green belt land in order to 'safeguard' it for future use is set out in the Council's Exceptional Circumstances Statement, and within the Green Belt assessment/review. For clarity, this land is not proposed for allocation, and if it is to be allocated this will need to come through a future review of the Local Plan. No change proposed.	No
A0586	B013	SHF035 should replace SHF034 as the preferred safeguarded land for future housing in Shifnal.	Shropshire Council considers that the proposed development strategy for Shifnal and the existing and proposed allocations and identification of 'safeguarded' land contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). No change proposed.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0586	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15	No	No	Not Specified	Draft Policy S15 is unsound. The current strategy for Shifnal will result in successive Green Belt reviews (contrary to the NPPF), as it does not make adequate provision for non-delivery of sites, affordability (it will exacerbate existing issues - detailed within appendices to this representation) and local demand. This supports justification for reserve sites. Consider insufficient safeguarded land has been identified to meet the longer term needs of Shifnal, allowing flexibility and opportunity for a choice of potential allocation sites in future, ensuring the longer term sustainability of the Local Plan or achieving key aspirations to improve the Green Belt. This is a significant error of the site assessment process and will likely result in the need for a further Green Belt Review at the end of the proposed Plan period, contrary to para 139 of the National Planning Policy Framework (NPPF). No allowance is made for reserve sites to meet shortfall in housing delivery or an increase in affordability issues in locations such as Shifnal (the pandemic has already impacted on house prices in commutable rural locations, worsening affordability), which has the second words lower quartile affordability ratio and worst median affordability ratio in the County. Consideration of compensatory improvements to the environmental quality and accessibility of the remaining Green Belt, as required in the NPPF and National Planning Practice Guidance when undertaking the site assessment and identification process has been insufficient. See wider representations on SHF108b/d, SHF034 and SHF035.
A0587	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Weston Rhyn WRPVAR001	Yes	Yes	Yes	Support the site and its associated guidelines. Site is available, deliverable and viable.
A0588	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Ellesmere ELL008 ELL033	Yes	Yes	Yes	Response seeks to support allocation of sites ELL008 and ELL033. The site lies within a highly sustainable location on the built-up edge of Ellesmere and sits comfortably within the existing pattern of development. It forms part of the previous planning permission 14/04047/OUT - for mixed use development. Various reports were provided in support at the time of application and are provided as appendices to the response for reference: 02 Heritage Assessment; 03 LVIA; 04 Archaeological Report;05 Transport Assessment; 06 Tree Report;07 Protected Species Report;08 Flood Risk Assessment The land is available, viable and deliverable. Site owned by Burbury Investments Ltd who have via Local Plan consultations and the submission of planning applications for development confirmed their intention to develop the site at the earliest opportunity. The site is confirmed as meeting the conditions for being available for development. The site will be made available for development when formally allocated. It is anticipated that the sites will come forward in the 'Short Term' (2020 to 2025) with completion in the 'Medium Term' (2025 to 2030)
A0589	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Baschurch	Yes	Yes	Yes	The amendment of the settlement boundary of the village at Shropshire Stone and Granite Works, to the south east of Station Road and to the west of the Railway Line in the northernmost part of the village reflects the implemented planning permissions 14/02286/OUT and 17/02174/REM. Commencement February 2021. There is also a current application 21/00666/FUL on the Phase 2 land to the rear (34 dwellings and 6 workshops) with Phase 1 & Phase 2 due to be developed by Shingler Homes in 2021. The adjustment of the boundary is a sensible housekeeping amendment to the plan, to reflect the change from 'open countryside' to 'developed land'. Supporting documents including site layout, ground report, ecology report, FRA, Heritage Impact Assessment, Noise Report, Planning Statement are available.
A0590	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whitchurch WHT037 WHT044	Yes	Yes	Yes	Support and press for the retention of the allocation of sites WHT037 and WHT044. The site lies within a highly sustainable location close to Whitchurch town centre and its services and facilities. It is on the built up edge of Whitchurch and sits comfortably within the existing pattern of development. Opportunity for access to serve WHT044 from B5395 road frontage & for WHT037 via WHT004. Note 'Development Guidelines' suggest that there should not be a link between Chester Road and Tarporley Road The highway network is capable of accommodating the development proposed. Acknowledging local concerns raised regarding the issues of drainage around the site the response details drainage requirements, investigations & drainage solutions available including main sewer connection, SUDs and alternatives. It also confirms that drainage issues will be the subject of detailed assessment at the planning application stage and will fulfil the criteria within Building Regulation Approved Document H (extract provided) , NPPF and Local Plan Policy CS18 The land is available, viable and deliverable and will be brought forward at the earliest opportunity. The site is confirmed as meeting the conditions (including landowners wishing to sell) for being available for development. The site will be made available for development when formally allocated. It is anticipated that the sites will come forward in the 'Short Term' (2020 to 2025) with completion in the 'Medium Term' (2025 to 2030).
A0591	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Prees PPW025	Yes	Yes	Yes	Response seeks to support the allocation of site PPW025. The site lies in a highly sustainable location on the built up edge of Prees and sits comfortably within the existing pattern of development Scheme for site responds positively to all of the issues raised within the Development Guidelines including: appropriate mix of dwelling types informed by Prees 'Right Home Right Place' survey 2018; planning permission 14/03511/OUT agreed access point and design will be used along with any other required highways works; retention of frontage trees and hedges and provision of open space along the western side of the site; appropriate consideration of nearby listed buildings and heritage asset; use of acoustic design will be used to appropriately manage road noise; 2018 application included an appropriate Flood Risk Assessment, informed by a sustainable drainage strategy & houses will be excluded from the elements of the site located in flood zones 2 and/or 3 which form part of the Green Infrastructure network. It is confirmed that the site is available, deliverable & viable. The site in one ownership which simplifies delivery & an option is held to develop the land for residential purposes. Previous planning application 14/03511/OUT demonstrates the desire to develop the site & the documents required for a planning application are ready for submission & this would be done within 1 month of Plan adoption. Hawk Developments plan to swiftly develop once planning approval obtained. Timescales are set out in the representation which expect completion by Autumn 2026 assuming Plan & planning application approvals. Supporting information provided which includes supporting statement; existing site plan; indicative site plan; flood plan; tree report; ecological appraisal; flood risk assessment

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0586	B014	Review the site assessment process. Identify further sites for residential development both for within the proposed Plan period and beyond. SHF035 should be identified as a reserve housing site or SHF035 should replace SHF034 as the preferred safeguarded land for future housing in Shifnal or SHF035 should be identified as additional safeguarded land for future housing need in Shifnal.	Shropshire Council considers that the proposed development strategy for Shifnal and the existing and proposed allocations and identification of 'safeguarded' land contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). It is considered the objector is unclear as to what they wish the Council and EiP to consider with the proposed alternative site. The argument is made that Shifnal does not have sufficient 'safeguarded' land proposed, yet one of the options presented is to replace the proposed area of 'safeguarded' land with theirs. Furthermore, it is considered the option of allocating their site as a 'reserve site' fails to address the issue of Green belt release in any meaningful manner. The Council has addressed the issue of delivering increased levels of affordable housing in draft policies DP3-DP7. No change proposed.	No
A0587	B001	n/a	Noted	No
A0588	B001	n/a	Noted.	No
A0589	B001	n/a	Noted .	No
A0590	B001	n/a	Noted.	No
A0591	B001	n/a	Noted	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0592	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Shawbury SHA019	Yes	Yes	Yes	<p>Response provides supporting information in respect of the allocation of site SHA019. A drawing is provided which shows the site area, access and the issues surrounding the development of the site. As the only allocation in Shawbury anticipated that Phase 1 of the site be developed for up to 40 dwellings and Phase 2 for up to 40 dwellings. Plan is provided showing phases, access; open space, drainage and other considerations. A topographical survey is provided;</p> <p>The land is available, viable and deliverable and will be brought forward at the earliest opportunity. The site is confirmed as meeting the conditions (including landowners wishing to sell) for being available for development. The site will be made available for development when formally allocated. It is anticipated that the sites will come forward in the 'Short Term' (2020 to 2025) with completion in the 'Medium Term' (2025 to 2030)</p> <ul style="list-style-type: none"> <li>•Highlights that part b) of Policy DP1 Residential Mix' will apply as no RHRP Local Housing Need Survey for Shawbury and that the suggested affordable housing requirement of 10% will be through mix of affordable rent/discounted sale/shared equity etc determined in consultation with the provider and the Shropshire Council .</li> <li>•CIL payment requirement is identified;</li> <li>•Arrangements for appropriate vehicular access via A53 roundabout and through Oaklands Park &amp; protection of Bus Turning/Parent Parking Facility are confirmed;</li> <li>•Development Guideline for footpath links are identified and routes of proposed footpath link shown on submitted aerial imagery extract.</li> <li>•It is suggested that the strategic area of open space could be alongside the other open space area within existing Lioncourt 'Oaklands Park' Development with localised areas of open space within the allocated site area;</li> <li>•Confirmation that the layout and design of the properties close to the site will respect the identified heritage assets, although it is expected that the built development will be a significant distance from these structures;</li> <li>•aerial imagery extract shows trees and hedge lines &amp; indicates that although elements of the internal hedge lines will be lost to provide access routes within the site but the remainder should be accommodated within the development of the site wherever possible;</li> <li>•Accommodation of Anaerobic Digester standoff distance of 175m can be accommodated;</li> <li>•Arrangements for foul and surface water drainage referencing site guidelines and agreed assistance (with £30, 000 allocated ) in improving culvert related flood problems are set out ( including detailed Plans of Shropshire Council agreed drainage works )</li> <li>•Noise considerations are detailed;</li> <li>•Measures to protect the amenity of the neighbouring properties are set out;</li> <li>•Availability of services detailed</li> </ul>
A0593	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	WHT037 and WHT044 (Whitchurch)	Yes	Yes	Yes	<p>The settlement boundary of the town has been amended to accommodate the allocations WHT037 and WHT044 along Chester Road which form a logical extension to the settlement. The site lies off the B5395 (formerly an A41 trunk road). The highway network is capable of accommodating the development. However, the position of the site access should not prejudice the longer term development of site WHT043 on the opposite side of the B5395. Ideally the 2 sites would be accessed from a roundabout which would also provide traffic calming. It is requested that the Development Guidelines be amended to ensure the land to the west is not sterilized.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0592	B001	n/a	Noted	No
A0593	B001	As referenced in comments, request that Development Guidelines include the references to the site access to ensure the land to the west is not sterilized	<p>Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p> <p>The draft site guidelines for proposed allocation WHT037 &amp; WHT044, including those relating to highways, are also considered appropriate.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0594	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.2 Land N of Tudor House, Prees	No	No	Not Specified	<p>Allocation of site PPW025 is not justified, is unsound, unsustainable and not demonstrated as deliverable &amp; superior, more sustainable site PPW021a which is within the Prees Community Hub should be allocated instead. Site PPW021a can deliver around 60 units with the added benefits of additional open space to serve the community as well as the provision of retail until. The site is deliverable with no insurmountable constraints and should be allocated in preference to site PPW025.</p> <p>Site PPW021a has not been properly or fairly assessed. Representation details lack of consideration of the site PPW021a with submitted supporting evidence not being considered &amp; request for meetings ignored &amp; not arranged at a sufficiently early opportunity to allow inclusion of the site for allocation. The Council has failed to work proactively with site promoters as is expected by the NPPF for applicants and can reasonably have been expected in relation to the Local Plan review given the substantial supporting information submitted.</p> <p>The Council have identified a site as a preferred option at a very early stage and have failed to justify why alternative sites (including PPW021a) are unacceptable and there is doubt whether they have received due consideration. 2018 SLAA status the same for PPW025 &amp; PPW021 &amp; Regulation 18 SA scores PPW021a higher (good) than PPW025 (fair). Both sites in flood zone 3. There is evidence that preferred site (PPW025) was considered unacceptable by the Parish Council (Appendix A to response).</p> <p>Consideration of policy for allocation PPW025 demonstrates significant &amp; fundamental issues requiring resolution including flood risk management and acoustic mitigation with no evidence, including site layout, of how such issues can be overcome. No evidence of benefits are achieved through development of PPW025 to outweigh the benefits of PPW021a, including whether the development will help to address the existing flood issues in the vicinity. PPW025 likely to increase water run off to the brook. The proposed allocation PPW025 is close to the Conservation Area and several listed buildings and it is not clear if or how impact on the historic environment can be mitigated which may prevent development.</p> <p>Benefits of PPW021a include: provision of a shop on site (unachievable on PPW025), spacious well landscaped layout with opportunities for flexibility of development, better design &amp; substantial housing mix; addressing flood issues;</p> <p>Development of the site PPW021a can meet the 3 overarching objectives for sustainable development due to: close proximity of railway station; provision of convenience retail to serve the immediate area and discourage car use; high standard of design &amp; spacious layout, including substantial open space; proposed mix of housing; make effective use of the land that is viewed as part of the existing village but has no public access to it, including open central area for community use, public footpaths along the brook through the site thus providing informal recreation facilities that are currently lacking in the village; all dwellings &amp; gardens outside flood zone; provision of balancing ponds that will help ease existing flooding mitigating flood risk on site &amp; providing betterment elsewhere; safe access outside flood zone or mitigated by ground raising achievable; Substantial site landscaping will encourage wildlife. Section 3 part (b) of the NPPF objective is particularly relevant as the site would provide a development of a high standard with benefits to the village that other sites cannot provide due to restrictions on size or siting.</p> <p>Site Assessment reference to back land inappropriate as site has a road frontage as identified in Access Statement.</p> <p>Appendices submitted to support response include:</p> <p>A Letter of objection from Prees Council to application No 14/03511/OUT which is now the preferred option site PPW025.</p> <p>B Letter in connection with application 14/03511/OUT to applicant from Environment Agency regarding hydraulic flood modelling and need for updated FRA</p> <p>C Email to Mark Barrow dated 29.8.2020 and response dated 11.9.2020.- regarding requests for meetings &amp; mishandling of site consideration</p> <p>D Letter (17 09 2020) as part of SC Regulation 18 Consultation – highlighting inconsistencies in the consideration of flood, highway aspects and other site matters; summarising benefits of development of PPW021a and questioning existence of contamination &amp; rationale for preference of PPW025 over PPW021a.</p>
A0594	B002	Sustainability Appraisal	S18.2 Land N of Tudor House, Prees	No	No	Not Specified	<p>Response highlights omission of reference to site PPW021a in the council's sustainability report n extract included as Apdx M to response) which needs to be addressed as unacceptable omission. Sustainability report appendices include preferred site (PPW025). Page 152 but no reference is made regards the sustainability of PPW021a.</p>
A0595	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Yes	No	Yes	<p>The Policy requires that residential development includes a mix of dwelling sizes, types and tenures in order to meet the identified needs of local communities. This should be in accordance with the council's Strategic Housing Market Assessment (SHMA). Specific provisions are made for at least 25% of open market dwellings to be 2 bedrooms or less; a further 25% of open market housing should be 3 bedrooms or less, but there is a need for this policy to be applied flexibly. Any housing survey relied on needs to be up to date and the policy should highlight this. Consideration should also be given to the expertise of house builders who have a strong understanding of housing market needs and demands in an area. Consideration also needs to be given to the relevant planning context and suitability of the site to accommodate the needs identified. Similarly the urban context - locality and suitability for a particular housing mix in urban design terms needs to be considered.</p> <p>Criterion 6 of the policy specifically requires on schemes of 50 dwellings or more an appropriate range of specialist housing for older people. This aspect of the policy is not justified by evidence and is not clear or effective. It is not understood why it only applies to schemes of 50 dwellings or more, or what "appropriate" provision is.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0594	B001	Allocation of site PPW025 is unsound, unsustainable and not demonstrated as deliverable & more sustainable site PPW021a should be allocated instead.	Shropshire Council considers that the proposed development strategy for Prees and the existing commitments (including existing allocations), proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. The proposed allocation has been informed by a proportionate and robust site assessment process. This site assessment process included consideration of site PPW021a.	No
A0594	B002	Response highlights omission of reference to site PPW021a in the council's sustainability report & an extract included as Apdx M to response) which needs to be addressed as unacceptable omission	Shropshire Council has undertaken a robust Sustainability assessment & site assessment process to inform identification of proposed allocations which included PPW021a at Regulation 18 & 19 stages.	No
A0595	B001	The policy should allow for additional flexibility to recognise how varying mix could be influenced by other evidence and material planning considerations. Justification is required for the 50 dwelling trigger and additional precision is required in respect of requirements for older persons specialist accommodation.	Noted. With regard to the bedroom size mix, it is considered that para's 2a/b of draft Policy DP1 provide an appropriate balance between ensuring that new development will include an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) about housing mix requirements, and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand. With regard to the requirement to provide housing for older people, the National Planning Policy Framework (NPPF) specifies housing needed for different groups in the community should be assessed and reflected in planning policies, this includes the needs of older people. The Strategic Housing Market Assessment (SHMA) indicates that growth in the number of older persons' households is a key feature in the population and household change projected to occur in Shropshire over the proposed Local Plan period from 2016 to 2038. It also identifies a specific need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision. In order to ensure the needs of older people are met, all residential development is expected to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. However it is considered appropriate to specifically require larger sites of 50 or more dwellings to include an appropriate range of specialist housing designed to meet the diverse needs of older people as this will ensure inclusive and sustainable communities. However, it is recognised that sites of 50 or more dwellings will be diverse in nature, as such a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0595	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Yes	No	Yes	Simplification of approach to provision of affordable housing to two bands of 10 and 20% across Shropshire is generally welcomed. Reference to viability review is also in line generally with the approach set out within national policy. However, the policy is overly detailed and prescriptive on the type of affordable housing to be provided with elements which would be better included within an SPD. Affordable housing needs change over time and such prescription on tenure split, rent caps and equity share is inappropriate in a Local Plan policy intended to apply for a 22 year plan period. Notably the broader definition of affordable housing with the NPPF Annex to the Framework and the policy should allow for a more flexible approach to the provision of a wider range of affordable housing. The Government are also consulting on further changes to the provision of wider affordable housing types and the policy should allow flexibility for this, including within the affordable housing definition.
A0595	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SHR177	Yes	No	Yes	Object to the Site Selection process and approach which has assessed and evaluated the land at Weir Hill Phase 3 is flawed & unsound. Weir Hill Phase 3 site SHR177 is a suitable, sustainable and deliverable site for residential development and a logical extension to the settlement, adjoining the existing residential areas. Allocation of the site would create a strong and well-defined settlement edge, without extending out into the wider open countryside. The site is further enclosed by the proposed employment allocation SHR166 to the north east of the site. The Vision Statement for the site previously provided has adequately addressed issues raised as well as opportunities which have emerged through phases 1 and 2 of the development. The site selection process (from SLAA to SA) is flawed & has not been fairly assessed land at Weir Hill Phase 3. The findings & conclusions of the SLAA lack evidence in support. The SLAA conclusions have unduly and incorrectly influenced the assessment of the site in key respects of landscape impacts, transport infrastructure and access, as well as sustainable land uses. The Sustainability Appraisal includes errors and incorrectly scores the site. These concerns are fundamental in respect of the soundness of the site selection process as it relates to the land at Weir Hill Phase 3, which is not allocated without good and sound planning reasons. The Sustainability Appraisal incorrectly underscores the site in a number of key aspects and also fails to take into account aspects of the proposed mixed use components to the proposals which would directly address any perceived deficiencies in local infrastructure or facilities. Specific issues with site assessments (in Appendix Q): -The existence of a Tree Preservation Order to the boundary of the site should not count negatively as no TPO trees are affected by the proposed development; -There is a Primary School within 480m of the site -The opportunity is proposed within the site for provision of a Doctors Surgery -Phase 1 and 2 of the development have facilitated bus access to the site and the site is well served within 480m by a regular service - None of the proposed site within a high-risk flood zone & assessment that "much of the it is in flood zones 2 and 3" is incorrect - Landscape sensitivity and visual impact over stated & evidence provided to show this -Highway access considerations judged without evidence and miss-conception that the London Road link road will not be delivered until much later in the plan period - None of the site proposed for development within the Environmental Network, & submitted proposals respond to opportunities to enhance the river corridor - Any suggested expectation of loss of the environmental network is incorrect - no impact by development on the River Severn, retention of trees and hedgerows & ecology surveys support the development without any undue harm as per Phases 1 and 2. Biodiversity gain proposed; - No contaminated land constraint -Noise from the railway line to the north is not a constraint -The development of the site would not have to await the development of Phases 1 & d 2 as London Road access to Phase 2 is complete Contrary to the Council's site assessment, supporting evidence submitted shows that the development can deliver a high-quality scheme including a new local centre with a range of uses to support the sustainability, including earlier phases of the development. The vision for the site is landscape led including significant open and mixed recreation space with areas close to the river protecting existing ecology interests & promoting enhanced biodiversity. Community use opportunities include new dedicated parking for walkers and country park visitors & other community space provision. The site is suitable for allocation for around 400 dwellings. Evidential material in support of the allocation in respect of landscape, transport and traffic, ecology, drainage etc has been previously submitted. The Council have misunderstood the delivery of associated infrastructure including the delivery timeframe for the new London Road link which will be in place to serve this site phase 3 (including construction traffic) as well as earlier phases. The delivery of the link road was conditioned in the planning permission for Phases 1 and 2 and the London Rd access and link road are completed and open to traffic and therefore available to provide access to Phase 3. Therefore, highway & traffic considerations have been incorrectly judged. Transport analysis undertaken on potential traffic implications for Phase also identifies the site is highly accessible including by non-car means; vehicle access is available and safe; traffic from the development has minimal impact on Preston Street, or the wider highway network and there is no highway or safety concerns that should prevent the site from being allocated. The Council have no transport evidence for the site which contradicts these findings. Council has also failed to appropriately and fairly consider localised, site specific landscape implications. This is evidenced by submitted supporting information - Vision Document (September 2020), Landscape and Visual Appraisal (PGLA, September 2020) and Transport Technical Note (Croft, September 2020); The Council's Landscape review & sensitivity assessment is a strategic assessment which does not make judgements on the appropriateness of specific developments on individual sites undertaken for which more detailed studies relating to specific site allocations and development proposals need to be undertaken. The character area classification of landscape sensitivity is therefore not a definitive factor in assessing site proposals, which have to be done in the context of the specific proposals. The supporting assessment provided highlights flaws and issues in the Council's landscape evidence including the lack of granularity and inaccurate and distorted broad brush gradings of landscape and visual sensitivity which render it unsuitable for specific site assessment for a site such SHR176 & inappropriate for making decisions on site allocations. The more appropriate and focused landscape assessment provided confirms significantly less sensitivity, less than other sites selected for allocation. The site and its sensitivity assessed as Medium Low and landscape impacts moderate to negligible in respect of the particular proposals including proposed open space and landscaping. Concerns regarding local of social infrastructure, to support overall development of 1000 addressed by the masterplan and proposals for the site (see Vision Document, September 2020) which provide a logical location for local community and social infrastructure in the heart of the development which is part of a wider vision for the site building on phases 1 & 2 with a riverside park the scheme components aligning with the Council's green infrastructure aspirations & Big Town Plan & integrating mixed community uses within the park with biodiversity gains and river as a local wildlife site. The Vision for Phase 3 of the Weir Hill development presents a high quality sustainable development supported by evidence which if more fairly and correctly assessed would have been allocated. Phase 3 is available for very early delivery in the Plan period and will support the plan housing delivery trajectory as other larger schemes will take some time to come forward.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0595	B002	The specific requirements within the policy should be deferred to an SPD or further flexibility should be provided for within the policy to ensure the policy remains relevant and appropriate over the plan period	Noted. Shropshire Council considers that the policy approach to proposed affordable housing contributions is appropriate. It responds to the significant affordable housing need identified in Shropshire and best available information on development viability, from within the Shropshire Viability Study. Shropshire Council also considers that the proposed tenure split effectively responds to evidence on affordable housing needs, as summarised within para 4.52 of the explanation to draft Policy DP3 of the draft Shropshire Local Plan. It also provides flexibility for alternative tenure splits where local need would support this. A Housing Supplementary Planning Document will support housing policies and provide further guidance.	No
A0595	B003	The assessment process should be re-run to re-evaluate SHR177 and a revised comparative assessment of its merits with others considered in order to soundly evaluate it as a reasonable alternative site which should be allocated for housing.	Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0595	B004	Sustainability Appraisal	SHR177	Yes	No	Yes	<p>Object to the Site Selection process and approach which has assessed and evaluated the land at Weir Hill Phase 3 is flawed &amp; unsound. Weir Hill Phase 3 site SHR177 is a suitable, sustainable and deliverable site for residential development and a logical extension to the settlement, adjoining the existing residential areas. Allocation of the site would create a strong and well-defined settlement edge, without extending out into the wider open countryside. The site is further enclosed by the proposed employment allocation SHR166 to the north east of the site.</p> <p>The Vision Statement for the site previously provided has adequately addressed issues raised as well as opportunities which have emerged through phases 1 and 2 of the development.</p> <p>The site selection process (from SLAA to SA) is flawed &amp; has not been fairly assessed land at Weir Hill Phase 3. The findings &amp; conclusions of the SLAA lack evidence in support. The SLAA conclusions have unduly and incorrectly influenced the assessment of the site in key respects of landscape impacts, transport infrastructure and access, as well as sustainable land uses. The Sustainability Appraisal includes errors and incorrectly scores the site. These concerns are fundamental in respect of the soundness of the site selection process as it relates to the land at Weir Hill Phase 3, which is not allocated without good and sound planning reasons. The Sustainability Appraisal incorrectly underscores the site in a number of key aspects and also fails to take into account aspects of the proposed mixed use components to the proposals which would directly address any perceived deficiencies in local infrastructure or facilities. Specific issues with site assessments (in Appendix Q): -The existence of a Tree Preservation Order to the boundary of the site should not count negatively as no TPO trees are affected by the proposed development; -There is a Primary School within 480m of the site; -The opportunity is proposed within the site for provision of a Doctors Surgery -Phase 1 and 2 of the development have facilitated bus access to the site and the site is well served within 480m by a regular service</p> <p>-None of the proposed site within a high-risk flood zone &amp; assessment that "much of the it is in flood zones 2 and 3" is incorrect -Landscape sensitivity and visual impact over stated &amp; evidence provided to show this - Highway access considerations judged without evidence and miss-conception that the London Road link road will not be delivered until much later in the plan period -None of the site proposed for development within the Environmental Network, &amp; submitted proposals respond to opportunities to enhance the river corridor -Any suggested expectation of loss of the environmental network is incorrect - no impact by development on the River Severn, retention of trees and hedgerows &amp; ecology surveys support the development without any undue harm as per Phases 1 and 2. Biodiversity gain proposed; -No contaminated land constraint -Noise from the railway line to the north is not a constraint -The development of the site would not have to await the development of Phases 1 &amp; d 2 as London Road access to Phase 2 is complete</p> <p>Contrary to the Council's site assessment, supporting evidence submitted shows that the development can deliver a high-quality scheme including a new local centre with a range of uses to support the sustainability, including earlier phases of the development. The vision for the site is landscape led including significant open and mixed recreation space with areas close to the river protecting existing ecology interests &amp; promoting enhanced biodiversity. Community use opportunities include new dedicated parking for walkers and country park visitors &amp; other community space provision.</p> <p>The site is suitable for allocation for around 400 dwellings. Evidential material in support of the allocation in respect of landscape, transport and traffic, ecology, drainage etc has been previously submitted. The Council have misunderstood the delivery of associated infrastructure including the delivery timeframe for the new London Road link which will be in place to serve this site phase 3 (including construction traffic) as well as earlier phases. The delivery of the link road was conditioned in the planning permission for Phases 1 and 2 and the London Rd access and link road are completed and open to traffic and therefore available to provide access to Phase 3. Therefore, highway &amp; traffic considerations have been incorrectly judged. Transport analysis undertaken on potential traffic implications for Phase also identifies the site is highly accessible including by non-car means; vehicle access is available and safe; traffic from the development has minimal impact on Preston Street, or the wider highway network and there is no highway or safety concerns that should prevent the site from being allocated. The Council have no transport evidence for the site which contradicts these findings. Council has also failed to appropriately and fairly consider localised, site specific landscape implications. This is evidenced by submitted supporting information - Vision Document (September 2020), Landscape and Visual Appraisal (PGLA, September 2020) and Transport Technical Note (Croft, September 2020);</p> <p>The Council's Landscape review &amp; sensitivity assessment is a strategic assessment which does not make judgements on the appropriateness of specific developments on individual sites undertaken for which more detailed studies relating to specific site allocations and development proposals need to be undertaken. The character area classification of landscape sensitivity is therefore not a definitive factor in assessing site proposals, which have to be done in the context of the specific proposals. The supporting assessment provided highlights flaws and issues in the Council's landscape evidence including the lack of granularity and inaccurate and distorted broad brush gradings of landscape and visual sensitivity which render it unsuitable for specific site assessment for a site such SHR176 &amp; inappropriate for making decisions on site allocations. The more appropriate and focused landscape assessment provided confirms significantly less sensitivity, less than other sites selected for allocation. The site and its sensitivity assessed as Medium Low and landscape impacts moderate to negligible in respect of the particular proposals including proposed open space and landscaping.</p> <p>Concerns regarding local of social infrastructure, to support overall development of 1000 addressed by the masterplan and proposals for the site (see Vision Document, September 2020) which provide a logical location for local community and social infrastructure in the heart of the development which is part of a wider vision for the site building on phases 1 &amp; 2 with a riverside park the scheme components aligning with the Council's green infrastructure aspirations &amp; Big Town Plan &amp; integrating mixed community uses within the park with biodiversity gains and river as a local wildlife site.</p> <p>The Vision for Phase 3 of the Weir Hill development presents a high quality sustainable development supported by evidence which if more fairly and correctly assessed would have been allocated. Phase 3 is available for very early delivery in the Plan period and will support the plan housing delivery trajectory as other larger schemes will take some time to come forward.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0595	B004	The assessment process should be re-run to re-evaluate this site and a revised comparative assessment of its merits with others considered in order to soundly evaluate it as a reasonable alternative site which should be allocated for housing.	Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0595	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	Yes	Yes	<p>Previous representations have resulted in no appropriate change, between Regulation 18 and 19 Plans. Despite context of policy and initiatives e.g. Help to Buy, Stamp Duty incentives etc which seek to boost the supply of housing and support Government's strong commitment to delivering 300,000 homes p.a. &amp; government statements strongly support for need for significantly more house building. The Housing White Paper (2017) "Fixing Our Broken Housing Market" preceded planning reforms aimed at addressing the housing crisis and the Government's latest consultation "Planning for the Future" (White Paper) seeks to fundamentally reform the planning system which is identified in that Paper as failing to deliver the homes required leading to persistent undersupply. The Paper also highlights the impact of the COVID-19 pandemic on quantity &amp; quality of housing delivery, inequalities and the economic importance of the construction sector role in economic recovery and lack of provision in Adopted Local Plans for new homes annually, relative to commitment to deliver 300,000 new homes in England. These issues are a fundamental driver behind the drive to an updated standard method and ongoing reforms to the planning system. They provide a fundamental material consideration underpinning submitted representation &amp; set out a significant context to understanding housing land needs, supply and its aims. The approach is to ensure that greater housing delivery in line with the Government's objectives to boost housing supply.</p> <p>It is therefore essential that the new Plan provides for an appropriate level of housing in line with required step change in the delivery of new housing. Accept and support the requirement for about 30,800 new dwellings for the plan period. In the context of current planning practice guidance, the requirement sets positive levels of growth (which the Plan states is) reflective of the Standard Methodology; supports long term sustainability of the County; provides flexibility to respond to changes in need, increases affordable &amp; specialist housing provision; supports diversification of the workforce and increased economic growth and productivity. Allied to this support the plan proposals to provide for employment growth to deliver around 330 ha employment development at 14 hectares p.a. Essential in the current economic climate that Shropshire provides support to business and opportunities for economic growth consistent with the economic objectives of the Framework. A strategy which plans for growth, provides sufficient land and other flexible development opportunities is key to support economic growth &amp; the Plan generally supports Shropshire's Economic Growth. To be an attractive location for investment Shropshire needs sufficient local workforce to meet jobs growth sustainably, i.e. reducing the need for commuting. Need for employment land delivery strategy to be supported by growth in housing provision to retain and attract the required workforce. Therefore, whilst the overall housing Plan review requirement supported there are fundamental concerns that Plan provisions will not result in the Local Plan housing requirement being met. Whilst the housing requirement is expected to be met by a combination of completions &amp; commitments, new Local Plan Allocations and Windfall, the extent to which these components of supply will contribute to the level expected is not clear and not supported by evidence.</p> <p>Specifically the following issues are highlighted (with reference to Appendices 5 and 7):</p> <ul style="list-style-type: none"> <li>• The base date of the 1st March 2019 for Appendix 5 Table needs to be updated, ideally to 1st April 2021, with completions and planning permissions. Issuing of planning permissions and delivery will have been affected by the Covid-19 pandemic. The contribution from "Commitments" should be critically assessed to ensure they can genuinely deliver in the plan period. No deductions are made for lapse or non-delivery and the overall delivery could be considerably less than anticipated. The contribution from SAMDev Allocations also needs to be critically reviewed. 3564 dwellings -yet to gain planning permission &amp; therefore future contribution to supply and their suitability should be re-evaluated. There is an undue and unreasonable reliance upon windfall sites. The Plan should provide for a greater degree of certainty through allocation of sites. A greater range and number of sites needs to be allocated. The principle of including a realistic, evidenced windfall allowance for some settlements is supported in helping to provide deliverability flexibility in line with NPPF para 70. Therefore the Plan needs to be supported by evidence that the level of windfall allowance proposed is appropriate and justified based on historic delivery rates and robust assessment of the potential for sufficient windfall delivery rates to continue for the duration of the plan period. It should take into account that potential for windfall is reduced with an up to date plan. Given a tightly drawn plan, the potential for windfall to continue at past rates over the full 22 year plan period is extremely unlikely. It is considered that, in line with the requirements of the NPPF, the Plan should be revised to reduce the reliance on windfall and allocate a larger number and wider range of sites to increase certainty of housing delivery and create a positive and proactive planning policy context to encourage sustainable growth. The likely consequence would be that the residual Housing Requirement to meet the full housing requirement, will be significantly greater. This is likely to result in the need to allocate more sites to ensure the plan requirement is met. Additional allocated sites will need to be genuinely deliverable within the Plan period and maintain a positive rolling 5 year supply. In this regard; The Plan does not contain a 5 year supply calculation upon adoption and reflective of the concerns above in respect of the components of supply, should ensure that the calculation is robust and evidences deliverability.</li> <li>• The Plan does not contain a clear trajectory for delivery over the plan period, vital to show that the plan requirement will be met, but also important to show maintenance of a 5 year supply over the plan.</li> <li>• The Table in Appendix 7 gives some indication of delivery over 5 year bands or phases, but does not provide the evidence of a trajectory for a supply over the plan period, year by year. A graph showing year by year supply would normally be provided as part of a plan to demonstrate a trajectory of delivery through the plan period.</li> <li>• Where Allocations are listed in Appendix 7, it is unclear as to what evidence has been used to formulate the expected delivery timeframes i.e. evidence base of any informed and evidenced delivery assumptions, development delivery programme, infrastructure requirements, constraints and risks to delivery for these sites. This is significant in that the Council recognise that a number of the larger sites will not deliver until very late in the Plan period, or beyond 2038. Given fundamental concern re lack of evidence for delivery assumptions, failure of some of the larger sites to deliver their required contribution to the plan housing requirement will put the delivery of the required housing at significant risk.</li> </ul>
A0595	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Yes	No	Yes	<p>Policy aims and aspirations are confusing in dual aspects of supporting and explaining how the Plan's housing requirements will be delivered and seeking to provide some flexibility and adaptability to changing circumstances particularly in the context of the Housing Delivery Test.</p> <p>The Policy appears to resist housing development which would lead to the residential development guideline for a settlement being exceeded. This may be appropriate where disproportionate growth is proposed in less sustainable locations and settlements, but where additional development is proposed in sustainable locations (e.g. Shrewsbury) and even exceeds its development guideline, such development which would otherwise be sustainable should not be restricted by the development guideline cap.</p> <p>Part 4 of the policy describes circumstances where additional market housing development outside of settlement development boundaries will be potentially acceptable. This additional flexibility outside of settlement boundaries is welcomed but policy is too ambiguous and limited in its application. Giving some flexibility to meet housing needs would make the plan sound. There are additional circumstances which should allow the council to look more flexibly at proposals for housing outside of Settlement Boundaries including where the council is failing their Housing Delivery Test, the absence of a 5 year supply or generally failure in the plan to deliver the housing requirement within the plan period. In this specific regard, this is not just on an individual settlement allocation basis but Shropshire wide, particularly as shortfalls in delivery in one settlement could still be sustainably be met in another. Such an approach would avoid the need for an early review of the plan and increase its longevity.</p>
A0595	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	Yes	No	Yes	<p>The Policy sets out various provisions in relation to the management of development in the Countryside. In respect of housing it confirms that new market housing will be strictly controlled outside of development boundaries. However, the policy should cross reference to the flexibility allowed for open market housing in the countryside within policy SP7 if the circumstances of policy SP7 are met.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0595	B005	<ul style="list-style-type: none"> <li>The base date of the 1st March 2019 for the Table in Appendix 5 should be updated. Completions and commitments should be updated, ideally to 1st April 2021 which would be the most up to date at the time of the Local Plan Examination.</li> <li>The contribution from Commitments and SAMDev Allocations should be critically assessed and deductions made for potential lapse and/or non delivery.</li> <li>The reliance upon windfall sites should be reduced and the Plan should provide for a greater degree of certainty and specifically plan for the allocation of sites.</li> <li>A robust 5 year supply calculation upon adoption should be provided, reflective of the components of supply and evidence of deliverability.</li> <li>A clear trajectory for delivery over the plan period needs to be included to show delivery of the housing requirement.</li> <li>The plan needs to evidence a trajectory for each of the larger sites to ensure the risks to their delivery at the rates suggested is known and understood and their contribution to the Local Plan requirement supportable.</li> <li>Additional sites should be allocated to plug any gaps in delivery of the housing requirement.</li> </ul>	<p>Noted. As recognised within the proposed explanation to draft Policy SP2 and Appendix 5, the supply and delivery of housing in Shropshire will be annually assessed through the Five Year Housing Land Supply Statement and the associated Authority Monitoring Report. This includes a critical assessment of the potential for commitments and SAMDev allocations to contribute to achieving the proposed housing requirement.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council also considers that the proposed development strategies for the settlements across Shropshire, the existing and proposed allocations and windfall allowances identified to contribute towards achieving these proposed development strategies are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Given the nature of Shropshire it is not surprising that windfall development represents a component of the housing land supply in both urban and rural areas - Shropshire is a large rural County containing the town of Shrewsbury, 17 other smaller settlements identified as Principal/Key Centres; and hundreds of other villages and hamlets. Consequently there is a constant and significant recycling of previously developed land; significant numbers of infill developments; high numbers of conversions of barns and other rural buildings; and significant delivery of affordable exception sites (which will be supplemented by the more diverse mechanisms proposed for such housing within the draft Shropshire Local Plan).</p> <p>Shropshire Council also considers that it has a robust five year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. Appendix 5 illustrates this supply - identified completions, commitments (including existing and proposed allocations) and appropriate windfall allowances (for settlements with development guidelines), which totals around 31,000 dwellings (excluding any windfall allowance for the wider rural area).</p> <p>As specified within the explanation to draft Policy SP2, whilst it is acknowledged that there will inevitably be fluctuations over time, which may result in annual rates of delivery falling below or exceeding this level, it is expected that this will 'balance out' to ensure that the housing requirement is achieved. As such, it is considered that this expected rate of delivery over the Local Plan period of around 1,400 dwellings per annum forms the most robust trajectory of future housing delivery in Shropshire and will be used to assess annual housing delivery.</p> <p>A cautious high level trajectory for proposed allocations is provided within Appendix 7 of the draft Shropshire Local Plan, based on proactive discussions with site promoters. If ultimately adopted, trajectories for sites will be kept under review as part of the Five Year Housing Land Supply Statement.</p>	No
A0595	B006	The policy should be amended as per response to allow the council to look more flexibly at proposals for housing outside of Settlement Boundaries including where the council is failing their Housing Delivery Test, the absence of a 5 year supply or generally failure in the plan to deliver the housing requirement within the plan period ( not just on an individual settlement basis but for Shropshire as shortfalls in delivery in one settlement could still be sustainably be met in another).	<p>Noted. The purpose of the draft Shropshire Local Plan is to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations.</p> <p>However, draft Policy SP7 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such, draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.</p> <p>As such, Shropshire Council considers that draft Policy SP7 is justified, effective and consistent with national policy. It is also considered that draft Policy DP1 is complementary in that it ensures the effective use of land and that the forms of housing delivered are responsive to the needs of local communities. Draft Policy SP4 deals with circumstances where there are no policies relevant to a planning application or the policies which are most important to determining the application are out of date at the time of making the decision.</p>	No
A0595	B007	The policy should cross reference to the circumstances under Policy SP7	Community Clusters consist of individual or groups of small rural settlements of varying function but with aspirations to maintain or enhance their sustainability through modest levels of appropriate development. As such only modest levels of development (of the types documented within the draft Policy) are envisaged, to support community sustainability. Therefore these settlements do not have residential guidelines, new proposed allocations or development boundaries. The policy defines its own considerations of cumulative impact of development. It is therefore not appropriate to cross reference to Policy SP7.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0596	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S1.1(i) ALB021 Albrighton	Yes	Yes	Not Specified	Supportive of the amended Site guideline wording in Policy S1.1(i), :‘Comprehensive masterplan required for ALB017 and ALB021. Design and layout will ensure vehicular, cyclist and pedestrian access from ALB017 into ALB021. Contributions to jointly required infrastructure will be proportional, based on the level of development forecast.’ This makes it clear that access from ALB017 into ALB021 must be ensured through a comprehensive masterplan and that the developers of ALB017 cannot ‘ransom’ or otherwise hold up the development of ALB021, which is in separate land ownership. The landowners for ALB021 are also supportive of the principle of a pro-rata arrangement for developer contributions across the site. An indicative site plan for ALB021 supplied showing that it can comfortably accommodate 31 dwellings, SuDS and a ‘buffer zone’ within land along the railway line. The scheme contains a mix of housing and the required level of affordable housing. All dwellings meet or exceed NDSS. The site plan shows a link road into ALB017 – this is indicative and can be changed, depending on access road position into the site from ALB017.
A0597	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	HNN016 Highley S9.1(i) 5.124- 5.127	Yes	No	Yes	Do not agree with the proposed allocation of HNN016 for 100 dwellings & consider that the allocation of this site is unsound. Whilst supportive of Highley as a Key Centre with new development responding to local needs, there are a number of issues with HNN016 which have not been properly considered or evidence provided to demonstrate how the issues may be overcome. These include: <ul style="list-style-type: none"> <li>• How HNN016 will address the access issues previously highlighted. The site is severely constrained by the limited frontage onto public highway at Bridgnorth Road. Question the site’s ability to deliver 100 dwellings and extra care facilities on this site, with very poor access. Do not consider that the width of a conventional priority junction is achievable within the site frontage without the requirement of additional third-party land which will need to be secured &amp; will potentially impact on scheme viability. Stage 3 of the Sustainability Appraisal assumes that access adjacent to the Telephone Exchange but no evidence on whether this is achievable and thus the scheme deliverable. It is not considered that any off-site works will be achievable for the site.</li> <li>• The reasoning put forward for the allocation is that “the site is well related to the built form of the settlement and existing allocated sites ..... would outweigh any harm to the significance of these listed buildings.” This conclusion is “woolly” at best and not known to be supported by any information, indicative layout plan or evidence re highway, access &amp; heritage considerations.</li> </ul> Site HNN019 is better located with more potential than the proposed allocation. Whilst it is within an area of potentially high landscape and visual sensitivity, this can be considered during the design phase. A comprehensive Vision Document and indicative layout which provides for Green Infrastructure, public open space, SUDs, and a Local Area for Play has already been submitted (previous representation & pre-application). The site proposals include residential development, medical centre with dedicated parking & extra care facility, dedicated bus layby pull in & parking spaces for Clee Hill properties to alleviate existing parking issues thus providing for all residents’ needs. Although the site is adjacent to the Conservation Area boundary of Clee Hill, a sensitive design approach can enhance the appearance and character of the Conservation Area, along with betterment in the parking solution.
A0597	B002	Sustainability Appraisal	HNN016 Highley S9.1(i) 5.124- 5.127	Yes	No	Yes	The Sustainability Appraisal fails to mention Grade II listed Hazelwell’s Farm House in proximity of the site along with other heritage assets in the near proximity which are referenced in site guidelines. Sustainability Appraisal flawed given that nearby heritage assets have not been taken into consideration when selecting HNN016 for allocation. It is only considered (briefly) at Stage 3 of the SA.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0596	B001	None.	Noted.	No
A0597	B001	Proposed allocation of HNN016 should be reconsidered and the Sustainability Appraisal undertaken again to reassess the suitability of alternative sites within the village in particular alternative site (HNN019) better fit with Local Plan Review policies & capable of achieving a better mix of residential development on the site & betterment in the relocation of the GP Surgery & provision of an Extra Care facility on the site, without impacting upon the setting of local heritage assets or the local highway network.	Shropshire Council considers that the proposed development strategy for Highley and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0597	B002	Proposed allocation of HNN016 should be reconsidered and the Sustainability Appraisal undertaken again to reassess the suitability of alternative sites within the village in particular alternative site (HNN019) better fit with Local Plan Review policies & capable of achieving a better mix of residential development on the site & betterment in the relocation of the GP Surgery & provision of an Extra Care facility on the site, without impacting upon the setting of local heritage assets or the local highway network.	Shropshire Council considers that the proposed development strategy for Highley and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity. The most recent Sustainability Appraisal undertaken to inform the draft Shropshire Local Plan (December 2020) identifies that the site is within 300m of a listed building and the Conservation Area.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0598	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S1 and Schedule S1.1(ii)	Not Specified	No	Not Specified	<p>Albrighton is a highly sustainable settlement (Key Centre within the settlement hierarchy) and benefits from excellent accessibility to Telford and Wolverhampton, being linked by a railway station and the M54 and A41.</p> <p>Note that despite an increase to the overall housing requirement from earlier stages of the Local Plan Review, allocations in Albrighton have reduced by 15 dwellings. This limits potential to deliver additional growth in Albrighton, to support the wider draft Shropshire Local Plan growth agenda, tackle local infrastructure priorities and address chronic under-delivery at Albrighton since 2006 (between 2006 and 2019 Albrighton's had lowest delivery of any Principal/Key Centre, reflecting constraints of the Green Belt).</p> <p>Albrighton is also in close proximity to RAF Cosford (likely subject to MOD investment/housing need and identified as a strategic site in draft Policy S21). Therefore crucial to consider potential for Albrighton to accommodate additional growth emanating from RAF Cosford. Policy S21 recognises the need to maintain the Green Belt/strategic gap between Albrighton and RAF Cosford. Acknowledge this takes into account evidence in the Council's Green Belt Assessment and thus limits the potential for future growth to the north-west of Albrighton, so growth should be directed away from here. In this context ALB014 offers an appropriate location for development.</p> <p>Contend in order to deliver 'step change' in the scale of development, the proposed housing guideline should be increased for Albrighton and Green Belt land be released (supported in relation to ALB014) for allocation rather than safeguarding for future development, over and above the current proposed allocation. This would be wholly in line with Albrighton's expected role in an 'urban focused' strategy, respond to chronic past under-delivery, be consistent with the wider housing and economic agenda in Shropshire including in relation to focusing growth on major 'strategic corridors', as well as providing further flexibility and boosting the supply of housing in line with national policy. As such, the current strategy for Albrighton is not justified and has not been positively prepared, and therefore not soundly-based.</p> <p>Also consider approach to windfall development is unjustified/not sound. Para 70 of the National Planning Policy Framework (NPPF) identifies the need for compelling evidence for windfall allowances having regard to strategic housing land availability assessment, historic windfall delivery and expected future trends. The windfall assessment in the Strategic Land Availability Assessment (SLAA), looks at past trends borough-wide, but has not analyse distribution of past windfalls in settlements. This is important as proposals for windfall for each settlement are simply the residual of the headline allocation required minus the capacity of proposed allocations. Do not agree with this approach or that compelling evidence for windfall allowances at Albrighton are made and it is simply used to limit allocations of land. To be credible, any windfall allowance at the settlement-level should be based on an assessment of likely future supply at the settlement-level, in line with the NPPF - the supply of windfall sites in Albrighton since 2006 has been limited compared to other non-Green Belt settlements where boundaries are not so tightly drawn. As such, where opportunities exist to deliver new development in sustainable locations that do not undermine the purposes of the Green Belt (most notably ALB014) it should be allocated, before any allowance is made for windfalls. Windfalls will then represent a 'buffer' that can help ensure the required growth at Albrighton is achieved. This would be more consistent with a plan-led approach to meeting housing needs, rather than relying on windfall sites without sufficient justification.</p> <p>Also object to the proposed development boundary for Albrighton as it is not justified, does not represent positive planning and is not soundly based. The boundary around this highly sustainable settlement remains too tightly drawn in an attempt to limit alterations to the Green Belt. A tight boundary means it is less able to flex and adapt to rapid change, as required by paragraph 11a of the NPPF. Consequently, it would be sensible to provide more flexibility through identification of additional allocations, rather than drawing a boundary that restricts the Council's options in dealing with unforeseen circumstances in the future.</p> <p>ALB014 is a 7ha site which has well defined site boundaries (roads to north, east and west) and is in a highly sustainable location with access to a good range of services and facilities (including the adjacent primary school) and excellent accessibility to the strategic road (A41/M54) and rail network (Albrighton Railway Station links the village with Wolverhampton, Telford and Shrewsbury). Initial masterplanning shows the site could accommodate around 160 dwellings and 1.7ha of open space. Its development would deliver significant social, economic and environmental benefits and the site is truly deliverable as per para 73 of the National Planning Policy Framework (NPPF) - suitable, available and achievable (as documented within the vision document for the site which is appended to this representation).</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0598	B001	<p>Site ALB014 should be allocated for development rather than safeguarded for development beyond the proposed Plan period.</p> <p>The proposed residential guideline for Albrighton should be increased.</p> <p>The proposed contribution of windfall sites towards achieving the proposed residential guideline for Albrighton should be reduced.</p> <p>The proposed development boundary should be amended to identify more sites in order to allow flexibility and respond to rapid change.</p>	<p>Shropshire Council considers that the proposed development strategy for Albrighton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Furthermore, proposed allocations and proposed safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Shropshire Council considers that the Green Belt Assessment and Green Belt Review undertaken to inform the draft Shropshire Local Plan are appropriate and robust assessments.</p> <p>Shropshire Council also considers the proposed development boundary for the settlement to be appropriate and reflects the extent of Green Belt and built form.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0598	B001 Cont'd						<p>Consider the site could be removed from the Green Belt without compromising the purposes of the Green Belt as defined in the NPPF (representation supported by a landscape and Green Belt assessment for the site and a critique of Shropshire Council's Green Belt assessment which concludes ALB014 makes a low-moderate rather than moderate contribution to the Green Belt). Broadly agree with the Council's statement on exceptional circumstances in that there are 'strategic level' exceptional circumstances to justify release of Green Belt at Albrighton. However, consider increasingly pressing need to address the identified housing shortfall from the Black Country constitutes 'strategic exceptional circumstances' in addition to those identified, which also provides clear justification for increasing the amount of land to be released from the Green Belt at Albrighton for development. Consequently, contend the Council's approach to defining strategic exceptional circumstances ignores this factor and is not justified or sound. Agree with the Council that 'site-specific' exceptional circumstances justify removal of ALB014 from the Green Belt, however disagree with the decision to not propose the release of the site, or any site, from the Green Belt for development - the Council's evidence shows the site is capable of delivering sustainable development. Therefore, support proposed removal of ALB014 from the Green Belt and recognition that development of the Site has potential and is acceptable in principle. However, consider the draft Shropshire Local Plan should allocate ALB014 for residential development rather than proposing to safeguard if for development beyond the proposed Plan period. This will ensure the draft Shropshire Local Plan is sufficiently flexible in terms of the supply of sites, would ensure a range of sites are available to the local market and would also contribute towards the need for additional land to address, in part, shortcomings with the proposed housing requirements (including potential contribution of Albrighton to unmet cross-boundary needs) identified within the wider representation. With regard to the Sustainability Appraisal (SA), do not agree with the approach taken in the selection of the preferred allocations at Albrighton. The SA states that it seeks to make sure the plan proposals are the most appropriate, given reasonable alternatives. However, the Council's preference for proposed allocations ALB017 and ALB021 contradict this and has not been adequately justified based on the SA results (Stage 2a - ALB017 performs fair and ALB021 performs poor (assessed together they perform fair), whilst ALB014 performs good (although note the error in the assessment of ALB014 for proximity to a primary school, which is a - when should be ++, this would make it the highest scoring site in Albrighton)), site screening (stage 2b - disagree with the conclusion for ALB014 that the site is not suitable as the reasoning for this is based on the SLAA and identified site-specific factors could be resolved and the site made suitable. Note that ALB017 and ALB021 were identified as not currently suitable, but are still proposed for allocation, currently seems to be used interchangeably raising concerns about consistency/transparency) and subsequent detailed review (Stage 3 - agree within the conclusion for ALB014 that it should be removed from the Green Belt, but consider it should be allocated. Assessment of ALB017/021 shows an element of bias choosing a site which needs mitigation to address SA concerns), nor is it justified why they are proposed for allocation ahead of more appropriate alternatives, including ALB014. The proposed allocations score significantly worse than site ALB014 (and many other sites assessed) in sustainability terms and so should have been discounted at the screening stage (2b). Consider these sites have been preferred simply because they were safeguarded land and so have been treated differently to other SLAA sites. This raises concern as to fairness and transparency in the site selection process. As such, do not agree the most appropriate alternatives, or indeed appropriate alternatives at all, have been selected in respect of site ALB017 and ALB017, or that proposed allocation of these sites has been justified. Consider ALB014 is the most sustainable of the assessment sites (no evidence preventing its allocation), which provides clear justification to support its allocation.</p>
A0598	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	<p>Note proposed housing requirement is based on calculation of local housing need using Governments standard method. Do not object to this calculation, but do object to the proposed housing requirement. Governments standard method for calculating housing need uses 2014-based sub-national household projections (SNHP) and identifies a 'minimum' annual need. It is therefore necessary, as per National Planning Practice Guidance (NPPG), to consider factors that might justify an appropriate (upward) adjustment as a basis for determining a housing requirement. Consider a higher requirement is justified as: - Level of growth proposed represents a reduction from recent rates of delivery. -Recent growth trends suggest changes in dwelling stock and housing completions are markedly different to trends observed prior to 2014 (which inform the 2014-based SNHP), causing higher in-migration or (comparatively) lower out-migration not captured in the 2014-based household projections. Specifically the average change between 2010 and 2014 was 906 dwellings whilst that between 2014 and 2019 was 1,632 dwellings. The Council's evidence indicates a significant increase in completions since 2016 (average of 1,876 dwellings between 2016 and 2019 compared with 1,090 dwellings between 2006 and 2016). - Proper regard should be had to the contribution the requirement could make to tackling pressing need for affordable housing (as recognised within the NPPG), this has not been sufficiently considered. The Council's 2016 FOAHN identified a need for 1,240 affordable dwelling per annum, representing 97.6% of the minimum annual local housing need and 86% of the proposed housing requirement. Despite this, within the Preferred Sites Consultation undertaken as part of the Local Plan Review, the Council were of the view that the proposed housing requirement would allow the opportunity to deliver affordable housing particularly as a percentage of new open market housing schemes. Within the draft Shropshire Local Plan, affordable housing need has significantly reduced to 799 dwellings per annum - could not located evidence of this. However, continue to consider the approach to addressing need for affordable housing is insufficient to make any meaningful contribution as it is unclear how the proposed target of 25% of all housing to be affordable will be achieved and this (7,700 dwellings) remains less than half the assumed need (17,578 dwellings); and there has been persistent under-delivery of affordable housing over the last 10 years of so (annual average between 2010 and 2017 was some 244 dwellings, just 30% of the total affordable need documented in the draft Shropshire Local Plan). As such consider not enough is being done to address need o tackle current and future affordable housing need. This can be achieved by increasing the supply of land in those locations deemed to be sustainable and on sites that are considered to be deliverable, in particular ALB014. -The National Planning Policy Framework (NPPF) indicates strategic policies (such as draft Policy SP2) should address any cross-boundary issues. Therefore, broadly supportive of the Council's 'in-principle' intention to contribute to unmet needs emanating from the Black Country. However the only reference to this is in the proposed explanation to draft Policy SP2. Contend draft Policy SP2 is inconsistent with para 21 of the NPPF as neither the principle or specific contribution are referenced within it, meaning it is not effective. Furthermore, how the extent of the 'soft' commitment toward the unmet cross boundary needs of the Black Country was arrived at is not explained and the proposed contribution is unsound and open to challenge. Consider the contribution should be revisited and increased, primarily to reflect recent evidence/material change not taken into account that housing need in the Black Country is increasing by 4,902 dwellings, increasing the housing land supply shortfall (the shortfall identified before this was between 26,918 and 29,288 dwellings up to 2038). This also raises further concerns with the justification and soundness of the approach taken. Reviewing migration trends between Shropshire and the West Midlands (data provided in representation), considered a credible basis for a reasonable contribution, in excess of 10% of total moves into Shropshire originate in the Black Country (2016-2019) justifying a higher contribution of around 10% to unmet need arising in the Black Country (current offer is around 5% of unmet need reducing to 4.4% as need increases due to changes to Governments calculation of housing need) increasing cross-boundary contributions from 1,500 dwellings to 3,419 dwellings (1,919 additional dwellings). This increase should be added to the proposed housing requirement to reflect the fact that the contribution towards the unmet need is over and above the local housing need in Shropshire, not a part of it. This results in a revised housing requirement of at least 32,719 dwellings (30,800 plus 1,919) for the draft Shropshire Local Plan. It is also unclear how contributions to unmet cross-boundary need will be distributed/which sites are to meet this need. Consider that it is necessary to assign sites against the contribution in order that the Council can properly monitor progress of the draft Shropshire Local Plan in delivering on its commitments and take the necessary actions where this is not happening as anticipated, without this the draft Shropshire Local Plan is not effective or positively prepared and therefore unsound. Suggest sites assigned to meeting this need should be based on a sequential approach that favours sites deemed sustainable, deliverable and located in relatively close proximity/accessible to the Black Country by public transport - sites located in the eastern Shropshire and situated along the A41/M54/A5 corridor are considered to be most appropriate when compared to other locations in the Borough. Site ALB014 should therefore be allocated for development.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0598	B001 Cont'd			
A0598	B002	<p>Revise the proposed housing requirement to at least 32,719 dwellings (increased contribution to unmet cross-boundary need).  Identify specific sites to accommodate accepted unmet cross-boundary need.  Consider revising the housing requirement in response to recent delivery (not considered within the 2014-based sub-national household projections) and high affordable housing need.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Government has recently consulted upon potential changes to the methodology for calculating LHN, including the potential use of the 2018-based sub-national household projections (SNHP). As a result of this consultation Government determined that it was most appropriate to retain the use of the 2014-based SNHP for this calculation. Furthermore, in responding to this Consultation, Shropshire Council indicated its significant concerns regarding the 2018-based SNHP, particularly with regard to their reliance on the 2018-based sub-national population projections (SNPP) which utilised only 2-years of internal migration data in their formulation.</p> <p>Shropshire Council would note that the proposed housing requirement represents an aspirational, but achievable housing requirement, which meets identified LHN and provides an opportunity to respond/support other objectives as referenced above. It represents an increase to that in the adopted Local Plan which itself represented an aspirational but achievable housing requirement, which exceeded past housing need calculations and continues to exceed calculations of LHN using Government's standard methodology.</p> <p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. It is considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0598	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	Note the proposed approach to the distribution of development remains largely unchanged from previous consultations and Albrighton remains a proposed Key Centre. However, remain concerned with the overall approach to distribution of housing across Shropshire, in particular the level of growth directed to Albrighton. The draft Shropshire Local Plan states Key Centres (as the third tier of urban location in an urban focused strategy) are to accommodate significant growth to maintain and enhance their roles and maximise economic potential. However, the proposed distribution of growth within the draft Shropshire Local Plan (table provided within representation), dilutes the level of development proposed within Key Centres earlier in the Local Plan Review (table provided within representation) and includes an over-emphasis on rural areas (31% of total development), significantly higher than the 16.7% proposed for the more sustainable Key Centres. This is illogical and inconsistent with an urban focused strategy of directing significant development to more sustainable urban locations. It also limits rather than maximises economic potential of Key Centres (as intended in draft Policy SP2), including Albrighton, where the residential guideline is constrained to the strategy rather than reflecting opportunities. Contends that the lack of focus on Key Centres, in proportionate terms, compared to other less sustainable locations has not been justified and does not represent positive planning, meaning that draft Policy SP2 is not soundly-based.
A0598	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	The proposed economic strategy underpinning the draft Shropshire Local Plan (referenced in draft Policy SP2 and set out in draft Policies SP12 and SP14) recognises the importance of focusing growth and development within strategic corridors as part of delivering a 'step change' in the economic performance of Shropshire. The first corridor identified is the M54/A41/A5, which includes Albrighton (accepted by the Council). However, this is not reflected in the proposed housing growth strategy as set out in draft Policy SP2, which makes no reference to the contribution that residential development within Strategic Corridors can make towards delivering the overall growth strategy for Shropshire up to 2038 (only reference made is in the supporting text to draft Policy SP2 at para 3.28). Criterion 1 of draft Policy SP14 is therefore wrong to state "The strategic approach in Policy SP2 seeks to deliver significant development and infrastructure investment within the 'strategic corridors' served by the principal rail network and strategic and principal road networks in Shropshire." As such, contend the housing and economic strands of the proposed spatial strategy are not sufficiently integrated, contradictory and inconsistent, creating a lack of clarity and meaning the draft Shropshire Local Plan is not 'clear and unambiguous' and is not justified, contrary to National Policy and unsound with regard to the status and purpose of Strategic Corridors with respect to housing development. These inconsistencies have clear implications for Albrighton, where growth will be restricted, ignoring the wider economic objectives of the draft Shropshire Local Plan/potential to contribute to delivering economic objectives and undermining its intended/potential role within the overall proposed spatial strategy.
A0598	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	Not Specified	Not Specified	Not Specified	Draft Policy SP1 is defined as a 'gateway' policy which establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner...". However, new development proposals would already be assessed against the other policies in the draft Shropshire Local Plan, which themselves cover the issues identified in draft Policy SP1. Consequently, there is a risk of duplication that could result in confusion for users. As such, see no planning benefit to retaining draft Policy SP1, given the acceptance that "The remaining strategic and development management policies of this Plan elaborate on the issues." and it should be deleted for the sake of clarity and succinctness.
A0598	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Not Specified	No	Not Specified	Consider the wording of para 2 of draft Policy SP5 is overly-prescriptive and reduced the ability of applicants to devise creative and innovative solutions to address particular site or locational considerations relevant to individual proposals. Such an approach is contrary to national policy, which advises that "Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable" and advises developments are "sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change..." The draft Policy is also not justified because no evidence is provided to demonstrate such a prescriptive approach is warranted in Shropshire.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0598	B003	Direct less growth to rural locations and more growth to Key Centres.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire is a large and diverse County with a very significant rural area. As specified within draft Policy SP2, recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in urban areas will be complemented by appropriate new development within Community Hubs and to a lesser extent Community Clusters and affordable housing within the wider rural area where there is evidenced local needs. We would note that the development attributed to rural areas in this response includes that proposed for within Strategic Settlements.</p> <p>With regard to Albrighton, Shropshire Council considers that the proposed development strategy and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Furthermore, proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0598	B004	Identify additional growth at Albrighton, consistent with its location along one of the identified 'strategic corridors'.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. This approach is considered to effectively plan for housing and employment development and positively responds to the Economic Growth Strategy for Shropshire (2017-2021) and specifically reflects the objective to prioritise investment in strategic locations and growth zones along strategic corridors utilising existing road and rail connections.</p> <p>With regard to Albrighton, Shropshire Council considers that the proposed development strategy and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics (this of course includes the location of the settlement), constraints and opportunities that exist. Furthermore, proposed allocations and proposed safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0598	B005	Delete draft Policy SP1.	<p>Noted. The draft Shropshire Local Plan should be read as a whole. Shropshire Council considers it is appropriate to include draft Policy SP1 as a 'gateway' policy within the draft Shropshire Local Plan. This draft Policy, supplements the proposed vision and sets the context for the wider development framework within the draft Shropshire Local Plan. It is considered appropriate for all proposals to have consideration to the strategic issues identified within draft Policy SP1 as a starting point. The remaining proposed strategic and development management policies of the draft Shropshire Local Plan expand on the issues.</p>	No
A0598	B006	The word 'must' from para 2 of draft Policy SP5 should be replaced by more appropriate wording that reflects national policy objectives on design.	<p>Noted. Shropshire Council consider the requirements of para 2 of draft Policy SP5 are appropriate and consistent with national policy. Requiring development to maintain and enhance the character, appearance and historic interests of settlements, streetscenes, groups of buildings, individual buildings and the landscape and, reinforce the hierarchy of networks and spaces in accordance with national planning policy and the design principles set out in the West Midlands Design Charter is considered to provide a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable whilst also allowing for appropriate creativity and flexibility of design in achieving these requirements.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0598	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	No	Not Specified	<p>The intention of draft Policy SP7 is to provide an arbitrary cap on the number of dwellings delivered in any given settlement - including in the strategic, principal and key centres. It creates a two stage assessment of planning applications, the 1st against draft policies, the 2nd against criterion 3 of draft Policy SP7. Object to this two stage process.</p> <p>Firstly, no evidence is presented to justify the inclusion of such an approach under criterion 3, including the need to demonstrate that exceeding the residential guidelines is likely to cause adverse harm. Secondly, residential guidelines to which this criterion relate are not based on 'maxima' or 'caps' or an other 'limitation' on the number of homes that could be delivered at any given settlement, therefore questions the need for it. Therefore, seeking to apply a 'cap' on development is at clear odds with the purpose of using 'guidelines'. Thirdly, this appears to be an attempt to define, in policy, what material circumstances should be applied by the decision-maker, this is not the role of the Plan. Fourthly, question the necessity for the additional criterion given that the draft Shropshire Local Plan contains a range of policies that allow the decision-maker to determine whether or not proposals are acceptable in planning terms.</p> <p>As such, consider criterion 3 of draft Policy SP7 is unsound and should be deleted.</p>
A0598	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	Not Specified	Not Specified	<p>Support proposal to remove ALB014 from the Green Belt. However object to the site being proposed as safeguarded land, rather it should be allocated for residential development given the case outlined within the wider representation regarding the need for positive allocations to be made at Albrighton.</p>
A0598	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	No	Not Specified	<p>With regard to the proposed optional technical standards (nationally described space standards and accessible and adaptable/wheelchair user dwellings) in draft Policy DP1, the draft Shropshire Local Plan relies on information regarding wheelchair use in households nationally, as well as the demographics of Shropshire, as justification for the proposed Policy requirements in draft Policy DP1. However, Question whether this is a sufficient evidential basis for the draft Policy, given there is no locally-specific evidence presented beyond broad demographic projections. As such, suggest the 'requirement' for such provision should be loosened to reflect the lack of specific justification in Shropshire for need for such properties, in accordance with national policy.</p> <p>Draft Policy DP1 also seeks to establish a requirement for sites of 50 or more dwellings to provide an appropriate range of specialist housing for the elderly. Object to this proposal as there is a lack of justification (no specific supporting evidence) it is necessary and deliverable/viable, Furthermore, such a requirement is contrary to national policy, which does not specifically require provision of such housing to meet specific needs akin to an affordable housing policy (para 62 of the National Planning Policy Framework).</p> <p>Draft Policy DP1 also required the mix of housing delivered on sites to be in accordance with the Strategic Housing Market Assessment (SHMA) and other local needs survey evidence. However, this only relates to needs of Shropshire-based residents) and does not reflect the needs of those households who would form part of the housing element over-and-above that which relates to 'Shropshire-only' housing needs, including the unmet need element emanating from outside the area. As such this wording is not justified or consistent with national policy and is unsound.</p>
A0598	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	Not Specified	Not Specified	<p>Acknowledges the criteria-based approach to securing on-site provision of affordable housing as a matter principle, with caveats to allow for circumstances where viability may impact on the ability of schemes to deliver the policy-compliant provision on site.</p> <p>However, object to proposed insertion of a planning condition into the policy regarding the need to transfer affordable dwellings prior to completion of 50% of the consented open market housing. Firstly, this criteria is not necessary as such requirements are set out in planning conditions that accompany a grant of approval. Secondly, it may not be appropriate or viable to apply this criteria in such a prescriptive manner. Therefore, the issue of how such triggers should be applied to individual schemes should form part of the planning application process including how best to proceed in consultation with the applicant and any relevant Registered Provider also involved. Thirdly, circumstances or events may occur through the life of a consent and/or the build out of a site which may necessitate changes to such triggers.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0598	B007	Criterion 3 of draft Policy SP7 should be deleted.	<p>Noted. The purpose of the draft Shropshire Local Plan is to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations.</p> <p>However, draft Policy SP7 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such, draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.</p> <p>As such, Shropshire Council considers that draft Policy SP7 is justified, effective and consistent with national policy. It is also considered that draft Policy DP1 is complementary in that it ensures the effective use of land and that the forms of housing delivered are responsive to the needs of local communities. Draft Policy SP7 forms part of the draft Shropshire Local Plan, which should be read as a whole, rather than forming a separate external consideration.</p>	No
A0598	B008	ALB014 should be removed from the Green Belt and allocated for development, rather than safeguarded for future development beyond 2038.	<p>Shropshire Council considers that the proposed development strategy for Albrighton and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Furthermore, proposed allocations and proposed safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>In accordance with national policy safeguarded land is identified to meet needs beyond the current Plan period and decisions on future allocation of safeguarded land would be a matter for a future Local Plan Review</p>	No
A0598	B009	<p>Requirements relating to nationally described space standards and accessible and adaptable/wheelchair user dwellings in draft Policy DP1 should be relaxed.</p> <p>Requirements for sites of 50 or more dwellings to provide an appropriate range of specialist housing for the elderly within draft Policy DP1 should be removed.</p> <p>Requirements for bedroom dwelling mixes should be significantly amended.</p>	<p>With regard to the proposed requirements for accessible and adaptable/wheelchair user dwellings (M4(2) and M4(3) dwellings), the Strategic Housing Market Assessment (SHMA) undertaken to inform the draft Shropshire Local Plan identifies that growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the Local Plan period from 2016 to 2038. It then calculates a total need for M4(2) and M4(3) housing equivalent to 77% of total household growth (of which M4(3) constitutes around 13%). As such Shropshire Council considers that the SHMA justifies the proposed thresholds for M4(2) and M4(3) standard dwellings.</p> <p>With regard to the proposed requirements for provision of specialist housing for the elderly, the National Planning Policy Framework (NPPF) specifies that housing needed for different groups in the community should be assessed and reflected in planning policies, this includes the needs of older people. The SHMA indicates that growth in the number of older persons' households is a key feature in the population and household change which is projected to occur in Shropshire over the proposed Local Plan period from 2016 to 2038. It also identifies a specific need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision. In order to ensure the needs of older people are met it is considered that there is a need to provide an appropriate range of specialist housing designed to meet the diverse needs of older people, including through such provision on sites of 50 or more dwellings. It is recognised that such sites will be diverse in nature and it is for this reason that a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors.</p> <p>With regard to the proposed criteria on bedroom dwelling mix, it is considered that para's 2a/b of draft Policy DP1 provide an appropriate balance between ensuring that new development will include an appropriate mix of dwellings to meet the needs of communities (based on either the results of Local Housing Need Surveys or the SHMA), providing certainty to all (the decision maker, local communities and the development industry) about housing mix requirements, and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factor as site specific characteristics, local need and market demand.</p>	No
A0598	B010	Delete the wording "...and no later than at completion of 50% of the consented market housing..." from para 1c of draft Policy DP3.	<p>Shropshire Council consider that the proposed Policy requirement of "ensuring applications for development with a requirement to provide affordable housing secure the interest of a Registered Provider, and that the affordable dwellings will be transferred to a Registered Provider as soon as possible, and no later than at completion of 50% of the consented market housing" is appropriate, provides certainty to all parties (including the community, development industry and decision maker) and ensures the timely delivery of affordable housing.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0598	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	No	Not Specified	Note reference in Criterion 1b of draft Policy DP11 to requirements for new residential comprising 10 or more dwellings to achieve a minimum of 19% improvement in the energy performance requirement in Part L of the 2013 Building Regulations. However, it is not the purpose of development plans to repeat or restate standards that are applied through separate legislation. Similarly, whilst the Council considers that setting local standards or requirements for building sustainability is justified as a matter of principle, the Council presents no evidence to support the inclusion of standards already sought through Building Regulation, as is the case in criterion 1b. Consequently, it is not appropriate or necessary to include specific reference to Building Regulations in a development plan policy and express this as a criteria to be applied to new development if such standards are sought in any event. Criterion 1b is not soundly-based as it goes beyond the remit of planning policy, and should therefore be deleted.
A0598	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Not Specified	No	Not Specified	Object to proposed criterion 3 of draft Policy DP12 (and relevant explanatory text) regarding a 10% biodiversity net gain (BNG), as: -The draft policy seeks provision of 'at least 10%' net gains for biodiversity on 'all development'. However, emerging legislation set out in the Environment Bill clearly states the biodiversity value percentage attributed to development is '10%', and not 'at least 10%' as suggested by the Council. The Council has therefore mis-interpreted and contradicts the intentions in the draft Bill, so is not legally compliant. -No evidential basis is provided for requiring a percentage increase above 10% in BNG on any development sites in Shropshire, so it is not justified. -No reference is made to the potential use of biodiversity credits as a means to secure the 10% BNG as part of new development proposals to be required under the Environment Act (once enacted). The Biodiversity Credits approach will offer applicants the ability to off-set on-site measures by purchasing 'credits' to meet the gain objective. -More fundamentally, question whether it is a sound approach to include references to emerging legislation that will, in any event, set down legal requirements for provision of 10% BNG on all qualifying developments. Contend that, once enacted, there will be sufficient legal controls placed on development to allow the Council to determine applications without the need for separate criterion as drafted under draft Policy SP12, so it is unnecessary. Therefore criterion 3 is not necessary with regards to addressing future requirements for BNG and its retention unsound.
A0598	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP15	Not Specified	Not Specified	Not Specified	Draft Policy DP15 sets out specific requirement for provision of at least 30sqm of open space per person assuming one person per bedroom. Question the evidential basis for this requirement given lack of any specific evidence in the draft Shropshire Local Plan to justify the policy. Suggest rather than applying arbitrary standards across all developments to the provision of open space in a prescriptive manner as is being proposed, a 'design-led' approach specific to the locality would be a better approach to ensuring appropriate access to open space is incorporated and addressed as part of the wider design and layout of sustainable places.
A0598	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP20	Not Specified	No	Not Specified	With regard to criterion 1 of draft Policy DP20, regarding requirements for water efficiency requirements in exceeds of Building Regulations, consider it is not the purpose of development plans to repeat or restate standards applied through separate legislation. Similarly, whilst the Council considers that setting local standards or requirements for building sustainability is justified as a matter of principle, the Council presents no evidence to support the inclusion of standards already sought through Building Regulation. Consequently, contends it is not appropriate or necessary to include specific reference to Building Regulations in a development plan policy and express this as a criteria to be applied to new development if such standards are sought in any event. The policy is therefore not soundly-based (not effective and positively prepared).
A0599	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1	Not Specified	Not Specified	Not Specified	The general extent of the Shrewsbury West Sustainable Urban Extension (SUE) (plan provided within representation) was identified within the adopted Core Strategy, a masterplan/phasing plan was then prepared for the site (phasing plan provided within the representation) to inform its specific allocation as a mixed-use SUE (parcel R2 is for residential development) within the adopted SAMDev Plan. Confirm parcel R2 of the Shrewsbury West SUE is suitable (forms part of a long-standing strategic allocation that is critical to delivering the housing requirement for Shrewsbury and there are no policy or technical constraints that are likely to impact on the delivery of the site in the short-term - no circumstances have changed which would warrant its reconsideration); available (there are no legal or ownership impediments that prevent the site from coming forward for development - owned by a land promoter who intends to sell the site to a house builder in due course and at the earliest opportunity); achievable (there is clear market demand for residential development in this location - outline and subsequent reserved matters applications were granted on the adjacent element of the SUE and parcel R2 is a logical next phase) as defined within the National Planning Policy Framework (NPPF). As such it is considered that the site is deliverable (as defined in the NPPF) and support continued/saving of the allocation of the SUE. Reviewed the policies and proposals related to the Shrewsbury West SUE and broadly supportive of the overall approach. Based on progress being made on bringing forward the Shrewsbury West SUE, broadly supportive of the assessment that all dwellings on the site will be delivered by 2038 and expected trajectory for the site (including 167 dwellings completed by 2024/25 documented within the housing land supply statement (2020)).

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0598	B011	Delete para 1b of draft Policy DP11.	Although the government announced its intention to amend Subsection 1 (c) of the 2008 Planning and Energy Act in 2015 - which states that Local Planning Authorities may include policies imposing reasonable requirements for 'development in their area to comply with energy efficiency standards that exceed the energy requirements of the building regulations' - these amendments have not yet been enacted. The intention of the amendment was to introduce higher energy performance requirements through building regulations, rather than the planning system. The performance increase was expected to be a 19% improvement. This improvement is also referenced in national policy through the 2015 Written Ministerial Statement - being equivalent to the Code for Sustainable Homes level 4 energy criteria which the Statement permits. However, the government's 2015 Productivity Plan subsequently stated that 'the government does not intend to proceed with .....the proposed increase in on-site energy efficiency standards, but will keep energy efficiency standards under review recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.' Recent government consultations on the Future Homes Standard and Future Buildings Standard indicate that such a review is ongoing with the outcome forming part of changes to Part L of the Building Regulations. However, these changes have not yet been made. Thus the Council believes that the powers afforded to LPAs through the 2008 Planning and Energy Act to set energy efficiency standards in new homes still exist and that this policy's requirements are appropriate. Provision is also made in the policy for higher Building Regulations standards to apply if/when these are implemented. No change proposed.	No
A0598	B012	Delete para 3 oof draft Policy DP12.	The Queens Speech of 11th May 2021 indicated Government's intention to introduce the Environment Bill in the upcoming Parliamentary year. The key element of the Environment Bill is at least 10% biodiversity net gain. The Council is confident that this will be carried forward into law and that it is appropriate to include it in Policy DP12 to give clarity to developers, communities and the decision maker on requirements. Therefore no amendment is proposed.	No
A0598	B013	Rather than applying arbitrary standards across all developments to the provision of open space in a prescriptive manner as proposed in draft Policy DP15, a 'design-led' approach specific to the locality would be a better approach to ensuring appropriate access to open space is incorporated and addressed as part of the wider design and layout of sustainable places.	The Shropshire Open Space Needs Assessment (2018) undertaken to inform the draft Shropshire Local Plan identifies the need for 30sq.m per person, which is reflected within draft Policy DP15. This requirement is consistent with the adopted Local Plan. Draft Policy DP15 is also considered to provide appropriate flexibility in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents.	No
A0598	B014	Delete para 1 of draft Policy DP20.	Noted. As explained within the para 4.185 of the Explanation of draft Policy DP20, Government has introduced an optional new Building Regulation standard that can be required through a Local Plan policy if it addresses a clearly evidenced need and its impact on viability has been considered. The Council can then apply the optional requirement as a planning condition on residential development proposals. This will be overseen by Building Control bodies (local authorities or approved inspectors). The optional requirement set out in the Building Regulation restricts water use to 110 litres per person per day whereas the normal requirement is 125 litres per person per day. The Shropshire Water Cycle Study recommends that new residential development in Shropshire adopts the 110 litres per person per day standard. This has been considered through the Shropshire Viability Study and forms the basis for this policy. It can be met through either a fittings-based approach, which imposes maximum consumption rates for various fittings such as WCs, basin taps, and showers, or by calculating the whole house water consumption using a 'water efficiency calculator' for new dwellings.	No
A0599	B001	N/A	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0600	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Yes	Yes	Yes	Support reference to equivalent standards to BREEAM in part 2 of draft Policy DP11 - changed from an earlier draft. This will enable Shropshire Council to consider proposals assessed with the Defence Related Environmental Assessment Method (DREAM) which is an environmental assessment tool developed by the DIO for new build and refurbishment projects on the defence estate.
A0600	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Yes	Yes	Yes	Support reference in para 4.130 of the explanation to draft Policy DP12 to the need for habitat enhancement and creation measures within designated safeguarding zones to avoid creating an environment that would attract large or flocking bird species - changed from an earlier draft. The inclusion of this wording helps to protect defence interests, particularly with regards to aviation safety.
A0600	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18	Yes	No	Yes	Noise sensitive development proposals close to areas where defence activities create noise can lead to noise complaints being submitted to the MOD. These can in turn result in MOD having to alter the way in which operational activity is undertaken or, at worst, lead to MOD having to withdraw from a site. This clearly has the potential to adversely impact on national defence interests and is contrary to para 95 of the National Planning Policy Framework (NPPF). Shropshire includes a number of MOD sites and the whole of Shropshire is covered by Low Flying Area 9 (LFA9), which is a dedicated helicopter training area for military helicopters. This means defence operations have the potential to impact on noise-sensitive development (examples provided) of which increasing numbers are being seen and in many cases they fail to adequately assess noise arising from defence activities. Welcome changes to draft Policy DP18 from an earlier draft, including inclusion of Part 11. However, consider wording does not go far enough to protect national defence interests as it only refers to development proposals "within a designated Ministry of Defence Safeguarding Zone" not having an adverse effect on an operational defence site, but there are other operational activities beyond these areas (for example LFA9 and Nesscliffe Training Area) and there may be occasions where development has the potential to impact on them. As such, to fully protect defence interests in accordance with para 95 of the NPPF, suggest the text is updated to recognise this. Welcome reference to requirement for noise assessments for development that would be sensitive to existing noise sources and a requirement for the MOD to be consulted where the existing noise source is related to defence activities in para 4.172 of the explanation to draft Policy DP18. However, to ensure that the risk of future noise complaints is reduced as far as possible (and consistent with reference to SHA019) consider a requirement to make future occupiers aware of the presence of military flying activities in the area should also be included. In principle support para 4.176 of the explanation to draft Policy DP18. However, it requires clarification, as it is not completely accurate, does not fully protect national defence interests due to the reliance on safeguarding zones and lack of reference to LFA9. Changes will also ensure the wording is appropriately justified and effective.
A0600	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP20	Yes	Yes	Yes	Support reference to equivalent standards to BREEAM in part 2 of draft Policy DP20 - changed from an earlier draft. This will enable Shropshire Council to consider proposals assessed with the Defence Related Environmental Assessment Method (DREAM) which is an environmental assessment tool developed by the DIO for new build and refurbishment projects on the defence estate.
A0600	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP26	Yes	No	Yes	Welcomes reference to aircraft safety and defence operations within draft Policy DP26. With regard to wind turbines, these can have a considerable impact on both aviation safety and operation of radar and technical assets, so welcome requirement to take defence interests into account. However, to improve effectiveness of the draft Policy, ensure it is justified and the most appropriate strategy, additional wording consistent with NPPG should be included within either the draft Policy or its explanation stating "Where a proposed turbine is 11 metres to blade tip or taller, and/or has a rotor diameter of 2 metres or more, it will be necessary to ensure that it would offer no detriment to the operation of defence technical assets such as radar". This would address the actual impact of wind turbines and would make prospective developers aware of the potential impacts of wind turbines.
A0600	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP31	Yes	No	Yes	Welcome specific reference to taking care to avoid the creation of attractant environments for large and flocking bird species. However, this only relates to restoration proposals. To fully protect defence interests, the need to mitigate bird hazard should extend throughout development/operation. To ensure draft Policy DP31 is in accordance with Para 95 of the National Planning Policy Framework and is fully effective and justified, para 4.275 should be reworded.
A0600	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17	Yes	No	Yes	Support reference to the need for noise from defence activities to be appropriately managed and requirement for engagement with the MOD as part of production of an appropriate noise assessment in the site guidelines for SHA019 - changed from an earlier draft. Also welcome and in principle support para 5.250 of the explanation to draft Policy S17.2. However, consider it needs to be amended to ensure clarity and factual accuracy. Also concerned this para only relates to development in the village and the designated safeguarding zones. In practice, sensitive development can still be impacted by noise from defence activities outside of these areas - see comments on draft Policy DP18.
A0600	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S19	Yes	Yes	Yes	From a safeguarding and ongoing operational requirements perspective, support the addition of part 3i of draft Policy S19. This provides clear direction that the design of new development would be required to have no detrimental impact on the operation of the airfield and associated technical assets.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0600	B001	N/A	Noted.	No
A0600	B002	N/A	Noted.	No
A0600	B003	Amend para 11 of draft Policy DP18 to state "Planning decisions should take wider security and defence requirements into account. Development proposals, in particular those within a designated Ministry of Defence Safeguarding Zone, must ensure that they have no adverse effect on an operational defence sites or activities." Amend para 4.172 of the explanation of draft Policy DP18 to include "Development for residential uses should ensure that future occupiers are aware that military aircraft may be seen and heard operating in the area and that aircraft may fly overhead." Amend para 4.176 of the explanation of draft Policy DP18 to include reference Low Flying Area 9 (LFA9) and clarify references to safeguarding zones.	Noted. Draft Policy DP18 recognises the importance of ensuring MOD operations are adequately considered in the context of new development proposals. For the purpose of clarity a series of minor modifications are proposed to Policy DP18 paragraph 11, the explanation to the policy paragraphs 4.172 and 4.176	Yes
A0600	B004	N/A	Noted.	No
A0600	B005	Include additional text either within draft Policy DP26 or its proposed explanation stating "Where a proposed turbine is 11 metres to blade tip or taller, and/or has a rotor diameter of 2 metres or more, it will be necessary to ensure that it would offer no detriment to the operation of defence technical assets such as radar".	Noted. Any development of wind turbines would be expected to comply with local and national policy and best practice guidance, including the National Planning Practice Guidance (NPPG). The NPPG identifies a number of safety considerations for wind turbines, as such for clarity this document will be cross-referenced with the explanation to draft Policy DP26.	Yes
A0600	B006	Amend para 4.275 of the explanation to draft Policy DP31 to state "Where a proposed development would result in mineral working or extraction falling within a designated safeguarding zone (Birdstrike zone / Plan B) it will be necessary for the applicant to provide and agree bird hazard management plans for the extraction, restoration and post restoration phases. It would also be necessary to agree details of the restoration of extraction sites to ensure that the development does not result in the creation of an attractant environment for large and flocking bird species that would reduce aviation safety."	Noted. For the sake of clarity a minor modification is proposed to ensure consideration of bird hazard as part of mineral working and subsequent site restoration.	Yes
A0600	B007	Amend para 5.250 of the explanation to draft Policy DP31 to state "RAF Shawbury adjoins Shawbury village's north-western development boundary. It is an important defence establishment, training students from across the UK Armed Services and international partners. Development in Shawbury village and within designated MOD safeguarding zones for this facility should ensure future occupiers are aware that military aircraft may be seen and heard operating in the area and aircraft may overfly the site".	Noted. For clarity of the relationship between RAF Shawbury and Shawbury, a minor modification is proposed to the explanation of this policy.	Yes
A0600	B008	N/A	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0600	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21	Yes	No	Yes	<p>RAF Cosford is, and will continue to be, an important defence establishment. Therefore, continue to support inclusion of the majority of RAF Cosford within this proposed Strategic Site allocation, and associated removal of the site from the Green Belt. Removal of the site from the Green Belt and the in-principle support for defence related development will reduce planning risk and support national defence.</p> <p>Whilst the principle of draft Policy S21 is supported, have the following comments:</p> <p>-Part 4: requires development of different parts of the site to be coordinated and complementary, however it is unclear how this will be achieved (particularly as the Midland Air Ambulance Charity (MAAC) element has recently gained planning permission). Requirement for a Masterplan for RAF Cosford needs to acknowledge it is an existing facility and this should not prevent development to support ongoing activities. It is also unclear what proactive engagement is envisaged. Modifications proposed in association with these issues.</p> <p>-Criterion B: welcome and support reference to a requirement for development on the MAAC site to not adversely impact on Ministry of Defence operations at RAF Cosford.</p> <p>-Criterion Q: welcome reference to the consideration of opportunities for improvements to pedestrian and cycle links into Albrighton.</p> <p>-Criterion H: acknowledge and support change made to this criterion from the previous draft so it no longer automatically requires the MOD to re-provide sports and recreation facilities if there is no longer an operational requirement for them, but will give the MOD the opportunity to demonstrate where facilities are surplus to requirements.</p> <p>-Criterion M: amendments from the previous draft of this Policy go some way to address previous concerns. However, inclusion of the wording "any new development" implies sustainable drainage will be required for all future applications, when, dependant on the nature of the application, this may not be appropriate. In order to ensure that the policy is fully justified, MOD would like to see the criterion amended to remove the first word "Any".</p> <p>-Criterion N: recognise para 138 of the National Planning Policy Framework sets out a requirement for compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of removing land from the Green Belt and understand the purpose of this criterion is to address this requirement. However, this criterion still has the potential to be onerous and confusing (applying to small scale development which would not be appropriate or achievable (as third party land may be involved) and could be read as requiring a number of improvements for each development) and would benefit from further clarification to ensure it is fully justified.</p> <p>A minor, factual clarification to Para 7.11 of the explanation to draft Policy S21 should be included for clarity.</p> <p>An editorial change is required to Para 7.14 of the explanation to draft Policy S21.</p>
A0600	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	Yes	Yes	Continue to support recognition of the RAF Cosford Strategic Site forming a centre of excellence for aviation and engineering, meeting military personnel accommodation needs and supporting the aspirations of the MOD within section 5d of draft Policy SP2.
A0600	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	Yes	Yes	Yes	Welcome addition of "operational defence" to the draft Policy SP10. This change will ensure that appropriate flexibility is given to proposals on defence sites and is supported.
A0600	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Yes	Yes	Yes	Support reference in part 2 of draft Policy SP11 to the Strategic Site at RAF Cosford being excluded from the Green Belt. Also support reference in part 7 to RAF Cosford being a strategic site inset within the Green Belt to "facilitate military and charity operational and development needs", however would request a minor factual change to read "facilitate defence and charity operational and development needs." Welcome and support change made to Paragraph 3.107 to an earlier draft of this policy, which provides clarification that RAF Cosford Strategic Site is removed from the Green Belt.
A0600	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 7	Yes	Yes	Yes	Support recognition in Appendix 7 that delivery of development at the strategic site at RAF Cosford falls across the whole plan period, and beyond. RAF Cosford is an existing, operational defence site and as such is likely to see development brought forward within the short, medium and longer term, whether this is required to expand / intensify the defence use of the site or help to maintain / support existing site uses and activities.
A0600	B014	Sustainability Appraisal	RAF Cosford	Yes	No	Yes	<p>Concerned that some of the assessments / conclusions in relation to the RAF Cosford Strategic Site are not factually accurate. Specifically the assessment of Part 28 and parts of CFD001, P30 and P40 (understand this relates to the RAF Cosford Site - would have been helpful if this was clarified) in Appendix T is inaccurate for the following:</p> <p>-A - score is given for proximity to a Local Nature Reserve, however consider the nearest is 500m away, greater than the 100m used in the assessment. Therefore a score of 0 should be given.</p> <p>-A - score is provided for TPO's within/on-site boundaries, unless this is evidenced should be a score of 0.</p> <p>-A - score is given due to lack of a GP surgery within 480m of the site, however this is an unfair assessment as there is a medical centre at RAF Cosford, which is primarily for regular uniformed personnel and their families / dependants. Therefore a + or at the least a 0 score should be given.</p> <p>-A -- score is given due to presence of listed buildings on the site. This is an unfair assessment as this building (Fulton Block) is being maintained and is in use. Therefore, it is not clear how the Strategic Site allocation would have such a negative impact on the listed building and the score should be adjusted accordingly to a '-' at most.</p> <p>-A - score is given for being within 300m of a conservation area. However the nearest is more than 300m for the site. Therefore the score should be amended to 0.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0600	B009	<p>Amend para 4 of draft Policy S21 so that it reads: "Development of the site will be informed by the preparation of detailed masterplans for each element of the site, informed by engagement, including with relevant landowners/occupiers of the wider Strategic Site; and will subsequently be adopted by Shropshire Council. These masterplans and any development proposals for the site will comply with the following site guidelines:"</p> <p>Amend para 4(m) of draft Policy S21 to remove the first word (Any).</p> <p>Amend para 4(n) of draft Policy S21 "Opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt will be included as part of new development proposals, in accordance with Green Belt Policy SP11. Compensatory provision to the remaining Green Belt at RAF Cosford could include appropriate additional planting to improve visual amenity and biodiversity and/or creation of linkages to green infrastructure networks and corridors beyond the site. Any such provision should not impede operational activities at RAF Cosford".</p> <p>Amend para 7.11 of the explanation of draft Policy S21 to clarify hosting of the Cosford Air Show.</p> <p>Amend para 7.14 of the explanation of draft Policy S21 to correct a minor editorial issue.</p>	<p>Noted. Shropshire Council considers that it is important and appropriate for the various components of the RAF Cosford Strategic Site to be coordinated and complementary, which will be achieved through the strategic planning, planning application and masterplanning processes. It is also considered appropriate to expect proactive engagement to occur on masterplans.</p> <p>Shropshire Council also considers it is appropriate to require any new development on the RAF Cosford Strategic Site to incorporate appropriate sustainable drainage and that this is consistent with the requirements of draft Policy DP22.</p> <p>Shropshire Council considers it is appropriate and consistent with national policy for any new development at RAF Cosford to contribute to opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt. This can effectively be achieved through a coordinated approach led through the strategic planning, planning application and masterplanning processes. To provide certainty that compensatory improvements can be provided, it is considered appropriate to indicate that specific improvements will occur, however this does not necessarily mean that other improvements cannot occur. It is however recognised that any improvements undertaken must not impede operational activities at RAF Cosford, and as such a minor modification on this issue is proposed.</p> <p>Minor modifications are also proposed to the explanation to draft Policy S21 in relation to the Cosford Air Show paragraph 7.11 and the editorial issue in para 7.14.</p>	Yes
A0600	B010	N/A	Noted.	No
A0600	B011	N/A	Noted.	No
A0600	B012	Part 7 of draft Policy SP11 should be amended to read "facilitate defence and charity operational and development needs."	Noted. For the purpose of clarity a minor modification is proposed to para 7 of draft Policy SP11.	Yes
A0600	B013	N/A	Noted.	No
A0600	B014	Scores should be amended within the Sustainability Appraisal for site Part 28 and parts of CFD001, P30 and P40 (see main issues for relevant scores).	The Donnington and Albrighton Local Nature Reserve lies either side of Rectory Road and is within 480m of the site boundary. There are no TPO's or Conservation Areas within 30m and 250m of the site boundary respectively. The SA process does not record a GP surgery on site and the Listed Building status is independent of the use of the building. Amending the scores for the TPOs and Conservation Area criteria would not change the site's rating – it would still be Fair- so the Council considers the proposed changes are not necessary.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0601	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	No	No	Draft Policy DP1 requires an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings. However, it is important to ensure specialist housing is appropriately delivered where need/demand arises. National research prepared by the Associated Retirement Community Operators (ARCO) identified a 6-mile market catchment radius for later living/specialist care facilities from last place of residence. As such, the proposed blanket approach that all sites of 50 or more dwellings should provide specialist later living housing is unjustified/ineffective and could result in delivery of facilities in the wrong locations to meet housing needs and location preferences. The location of specialist housing accommodation should be informed by evidence of localised housing needs and existing supply as opposed to large site location.
A0601	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	No	<p>For the reasons summarised within the para 3.6 of the explanation to draft Policy SP2, support the proposed approach in draft Policy SP2 of planning to deliver more than the minimum Local Housing Need calculated using Government's Standard Method. Indeed, this approach is supported by paras 11 and 59 of the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) (ID 2a-010).</p> <p>However, concerned about a very fundamental misalignment between the annual housing (1,400) and annual employment land (14ha) requirements. The Economic Development Needs Assessment (EDNA) undertaken to inform the draft Shropshire Local Plan indicates 142.83ha. (6.49ha per annum) of employment land is required to balance jobs and housing (note figures within the EDNA apply flexibility and churn/replacement of lost stock uplifts). The proposed employment land growth is double that required to support planned housing growth and as such is neither justified or effective as defined in the NPPF. This misalignment (identified as an issue within the EDNA along with a recommendation to undertake more detailed housing modelling which has not occurred), is likely to result in unsustainable commuting patterns due to insufficient availability of homes to meet the needs of the increased and diverse workforce with consequential cross boundary strategic implications. To achieve balance either the planned level of housing growth must significantly increase, and/or the level of planned employment land growth must significantly reduce.</p> <p>The EDNA tests other employment land forecasts scenarios, all of which (with the exception of past take-up trends which itself is meaningfully higher) are around half the proposed employment land requirement.</p> <p>-To meet the economic projections and regeneration objectives/commitments in the Marshes LEP Strategic Economic Plan scenarios, the employment land requirement should be around 7.6ha per annum (166ha over the proposed Plan period). But even at this level of employment land growth, further housing modelling is required, as more than 1,400 dwelling per annum are necessary to appropriately align jobs and housing.</p> <p>-Whilst the past take-up trends scenario is credible in principle, at 10.63ha per annum it is higher than the labour supply (and the economic projections and regeneration objectives/commitments scenarios). As such, credibility of the past trend scenario is highly questionable, particularly post-Covid19 where working practices and demand for employment space are likely to have permanently changed. Even if this scenario is accepted, the proposed employment land requirement remains higher and further housing modelling is required, as more than 1,400 dwelling per annum are necessary to appropriately align jobs and housing.</p> <p>Firmly consider the employment land requirement justified by the Council's evidence base is at best 166ha (7.6ha per annum), increasing to 196ha (8.9ha per annum) after factoring in the agreed 30ha contribution to unmet employment land needs arising in the Black Country and draft Policy SP2 should be amended to reflect this. Further housing modelling is also necessary to determine the amount of housing necessary to support this, and the proposed housing requirement figure within draft Policy SP2 and associated supporting text should accordingly be amended to reflect its outcome (Council monitoring confirms more than 1,400 dwellings per annum is deliverable - average of 1,637 dwellings per annum over the last 5 years and 1,876 dwellings per annum over the last 3 years).</p> <p>Any additional housing growth associated with this change should be accommodated in higher order settlements, such as Shrewsbury.</p> <p>Given the very significant over supply of employment land (EDNA identifies the current employment land supply as 410 ha), undeveloped allocated/approved employment land, such as that on the South Shrewsbury Strategic Urban Extension (SUE) (which has been actively marketed with little interest as it does not have direct access to the strategic road network and take-up is stronger around established employment sites), should be released for residential-led mixed development to meet the additional housing land required.</p>
A0601	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Not Specified	No	No	<p>Support the overarching principle within draft Policy SP12, which seeks to support and encourage economic growth in Shropshire over the proposed Plan period. Also support Shrewsbury being the primary focus for growth and investment to ensure that its role and function as the County Town and Strategic Centre protected and maintained.</p> <p>However, the Economic Development Needs Assessment (EDNA) undertaken to inform the draft Shropshire Local Plan indicates the proposed housing requirement would accommodate sufficient workforce growth to support employment land growth of 6.49 hectares per annum. However, to meet economic growth projections and regeneration objectives/commitments set out within the Marshes LEP Strategic Economic Plan, 7.6ha per annum are required.</p> <p>As such to ensure draft Policy SP12 is 'justified' and 'effective' further housing modelling to ensure that housing growth aligns with the Shropshire economic growth strategy must be undertaken and the housing requirement contained within the Local Plan accordingly uplifted.</p> <p>Any additional housing growth associated with this change should be accommodated in higher order settlements, such as Shrewsbury.</p> <p>Given the very significant over supply of employment land (EDNA identifies the current employment land supply as 410 ha), undeveloped allocated/approved employment land, such as that on the South Shrewsbury Strategic Urban Extension (SUE) (which has been actively marketed with little interest as it does not have direct access to the strategic road network and take-up is stronger around established employment sites), should be released for residential-led mixed development to meet the additional housing land required.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0601	B001	Para 6 of draft Policy DP25 should be amended to state "Unless robust evidence is provided demonstrating there is no localised need and demand, on sites of 50 or more dwellings:...."	Noted. The National Planning Policy Framework (NPPF) specifies housing needed for different groups in the community should be assessed and reflected in planning policies, this includes the needs of older people. The Strategic Housing Market Assessment (SHMA) indicates growth in the number of older persons' households is a key feature in the population and household change projected to occur in Shropshire over the proposed Local Plan period from 2016 to 2038. It also identifies a specific need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision. In order to ensure the needs of older people are met it is considered that there is a need to provide an appropriate range of specialist housing designed to meet the diverse needs of older people. It is considered that the distribution of sites of 50 or more dwellings will appropriately align with and contribute to meeting this need and as such this is considered an appropriate mechanism. However, it is recognised that sites of 50 or more dwellings will be diverse in nature and it is for this reason that a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors.	No
A0601	B002	Decrease the proposed employment land requirement to 7.6 ha per annum (8.9 ha per annum once contributions to unmet needs arising from the Black County is considered). Undertake further housing modelling to determine the housing requirement necessary to align with the proposed employment land requirement. Amend the proposed housing requirement as appropriate and allocate additional land for housing development. Given the very significant over supply of employment land in Shropshire, reallocate undeveloped/approved employment land, such as that associated with the South Shrewsbury SUE, to help meet market and affordable housing needs.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan. With regard to this evidence, we would note that calculations of the employment land requirement are based on the national assumption that employment land when developed, delivers 40% net floorspace from the gross land area, and that new employment is generated on that basis. However, available evidence suggests that employment land when developed, delivers on average 25% net floorspace in Shropshire. This has been given careful consideration when determining an appropriate employment land requirement. Furthermore, we would also note that the proposed employment land requirement actually represents a reduction to that within the adopted Local Plan (whilst the housing requirement has actually increased). The proposed employment land requirement incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan, where evidence indicates employment delivery opportunities are constrained. This reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas. In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038. It is considered that an appropriate balance is achieved between the proposed housing and employment land requirements. It is important to note that the proposed employment land requirement needs to respond to numerous factors in addition to the proposed housing requirement, including: achieving key economic objectives of the strategic approach in Policy SP2, such as providing for the delivery of a growing and diverse labour force (including those which commute out of the County), and in turn supporting the delivery of an improving rate of economic growth and an increase in the productivity of the local economy; wider aspirations within the Economic Growth Strategy for Shropshire; the nature of employment development in Shropshire (including the proportion of an employment site that results in net employment floorspace); the need to off-set the re-use of existing employment land for other purposes; and the wider range of employment uses now being accepted in the draft Shropshire Local Plan.	No
A0601	B003	Decrease the proposed employment land requirement to 7.6 ha per annum (8.9 ha per annum once contributions to unmet needs arising from the Black County is considered). Undertake further housing modelling to determine the housing requirement necessary to align with the proposed employment land requirement. Amend the proposed housing requirement as appropriate and allocate additional land for housing development. Given the very significant over supply of employment land in Shropshire, reallocate undeveloped/approved employment land, such as that associated with the South Shrewsbury SUE, to help meet market and affordable housing needs.	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. It is considered that an employment land provision at Junction 3 of the M54 Motorway is not required during this Plan period to 2038. The employment policies SP12, SP13 and SP14 would still be sufficiently flexible to accommodate such an outcome in the event that the circumstances determining the strategy for the Local Plan were to change considerably during the Plan period	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0601	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	Not Specified	No	No	<p>Concerns regarding the proposed employment land requirement identified within representation A0601 B002 on draft Policy SP2 equally apply to draft Policy SP13. Consider that, as identified within the Economic Development Needs Assessment (EDNA), there is a very significant existing level of oversupply of employment land (circa. 410 ha.) within Shropshire. As such, consider the presumption to effectively protect all allocated employment land and established employment areas over the plan period in para 7 of draft Policy SP13 appears wholly unjustified and unsound as defined in para 35 of the National Planning Policy Framework (NPPF). Given the very significant level of existing employment land supply, the level of employment land protection afforded within para 7 of draft Policy SP13 should importantly differentiate and prioritise established employment areas over allocated employment land.</p> <p>When assessing proposals for change of use or loss of employment land, para 7(c) of draft Policy SP13 refers to 'other significant Local Plan objectives'. In the absence of the draft Shropshire Local Plan setting out objectives alongside the proposed Spatial Vision, consider the delivery of housing and affordable housing should be specifically referenced in this para. Indeed, a key component of the proposed Spatial Vision is to ensure access to homes and affordable housing.</p>
A0601	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16	Not Specified	No	No	<p>Support the overarching principle of draft Policy S16, which recognises Shrewsbury as the Strategic Centre for Shropshire and the primary focus of new development in the County.</p> <p>Also support proposed housing guideline for Shrewsbury of at least 8,625 dwellings (28% of the total housing requirement for Shropshire).</p> <p>However, have fundamental soundness concerns over the proposed employment land guideline of around 100ha (32% of the total employment land guideline for Shropshire). As documented within representation A0601 B002 on draft Policy SP2, consider that to meet to meet economic growth projections and regeneration objectives/commitments in the Marshes LEP Strategic Economic Plan, a only 7.6ha of employment land per annum is necessary and justified and that a housing figure greater than 1,400 dwellings per annum is necessary. Consequentially, Shrewsbury's apportionment of:</p> <ul style="list-style-type: none"> <li>-The overarching housing requirement is too low and additional housing land needs to be identified as part of the Local Plan process.</li> <li>-The overarching employment land requirement is too high and should be reduced.</li> </ul> <p>To assist in meeting the additional housing land required at Shrewsbury, undeveloped allocated/approved employment land, such as that associated with the South Shrewsbury Strategic Urban Extension (SUE) (which has been actively marketed with little interest as it does not have direct access to the strategic road network and take-up is stronger around established employment sites), should be released for residential-led mixed development to meet the additional housing land required.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0601	B004	<p>Decrease the proposed employment land requirement to 7.6 ha per annum (8.9 ha per annum once contributions to unmet needs arising from the Black County is considered). Undertake further housing modelling to determine the housing requirement necessary to align with the proposed employment land requirement. Amend the proposed housing requirement figure as appropriate and allocate additional land for housing development.</p> <p>Given the very significant over supply of employment land in Shropshire, reallocate undeveloped/approved employment land, such as that associated with the South Shrewsbury SUE, to help meet market and affordable housing needs.</p> <p>Amend para 7(c) of draft Policy SP13 to state: "The application demonstrates that the proposed use will make a significant contribution to the local economy, the local community or to other significant Local Plan objectives, such as delivering market and affordable housing."</p>	<p>In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038.</p>	No
A0601	B005	<p>Decrease the proposed employment land requirement to 7.6 ha per annum (8.9 ha per annum once contributions to unmet needs arising from the Black County is considered). Undertake further housing modelling to determine the housing requirement necessary to align with the proposed employment land requirement. Amend the proposed housing requirement as appropriate and allocate additional land for housing development.</p> <p>Increase the proposed housing guideline and reduced the proposed employment land guideline for Shrewsbury.</p> <p>Identify additional housing land. Given the very significant over supply of employment land in Shropshire, reallocate undeveloped/approved employment land, such as that associated with the South Shrewsbury SUE, to help meet market and affordable housing needs.</p>	<p>The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan. With regard to this evidence, we would note that calculations of the employment land requirement are based on the national assumption that employment land when developed, delivers 40% net floorspace from the gross land area, and that new employment is generated on that basis. However, available evidence suggests that employment land when developed, delivers on average 25% net floorspace in Shropshire. This has been given careful consideration when determining an appropriate employment land requirement. Furthermore, we would also note that the proposed employment land requirement actually represents a reduction to that within the adopted Local Plan (whilst the housing requirement has actually increased).</p> <p>The proposed employment land requirement incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan, where evidence indicates employment delivery opportunities are constrained. This reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas.</p> <p>In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038.</p> <p>It is considered that an appropriate balance is achieved between the proposed housing and employment land requirements. It is important to note that the proposed employment land requirement needs to respond to numerous factors in addition to the proposed housing requirement, including: achieving key economic objectives of the strategic approach in Policy SP2, such as providing for the delivery of a growing and diverse labour force (including those which commute out of the County), and in turn supporting the delivery of an improving rate of economic growth and an increase in the productivity of the local economy; wider aspirations within the Economic Growth Strategy for Shropshire; the nature of employment development in Shropshire (including the proportion of an employment site that results in net employment floorspace); the need to off-set the re-use of existing employment land for other purposes; and the wider range of employment uses now being accepted in the draft Shropshire Local Plan.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0602	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17	Not Specified	No	Not Specified	<p>Identification of Clive as a proposed Community Hub is based on inaccurate, out-of-date and invalid data within the Hierarchy of Settlements Assessment (HoS) and as such draft Policy S17 is unsound as it is not based on accurate evidence, is not justified and is not effective.</p> <p>Shropshire Council have indicated the HoS will be consistently applied, amended if amenities were lost and if this means a settlement drops below the Community Hub threshold it would no longer be classified as such.</p> <p>The HoS includes two facilities for Clive that do not exist, without them Clive does not meet the criteria for Community Hub designation. These are:</p> <ul style="list-style-type: none"> <li>-A bowling green, situated within the private grounds of Clive Hall. The green was formerly used by Clive Bowling Club but in May 2018, the owners of the property issued notice to the Bowling Club that the facility was no longer available following sale of the property. This bowling green was not included within the original HoS but was subsequently added. The Parish Council notified Shropshire Council of the error and were assured it would be corrected. However, Shropshire Council argue the Open Space Needs Assessment (OSN) includes the bowling green and it is up to the community to demonstrate it is now surplus to requirements. Although this is demonstrably the case (since the Bowling Club now plays at an alternative green outside the Parish). The Playing Pitch and Outdoor Sports Strategy (PPOSS), supersedes the OSNA and was formally adopted by Shropshire Council in Nov 2020. PPOSS does not include this bowling green. It is therefore unjustified and unsound to allocate points to a facility that, as evidenced by the Council's own documentation, does not exist.</li> <li>-A convenience store, which closed in October 2020. Shropshire Council refused to accept permanent closure had taken place and, further, insisted on submission of a change of use planning application from the property owner (now submitted). However, the Council continues to include points for this non-existent facility. It is therefore unjustified and unsound to allocate points to a facility that does not exist.</li> </ul> <p>Consider the HoS has not been applied consistently throughout Shropshire with respect to how changes in amenities and services and subsequent reassessment of community status have been carried out. When the shop in Myddle closed and the Post Office in Westbury closed the HoS was updated and their settlement status also. No requirement was made for a change of use Planning Application. For Clive, the Council have refused to correct the HoS, deferring action and therefore requiring a main modification.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0602	B001	Remove Community Hub status from Clive and update policies and explanations as required.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0602	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2	Not Specified	No	Not Specified	<p>Identification of Community Hubs in draft Policy SP2 is not based on up to date, accurate, or appropriate evidence within the Hierarchy of Settlements Assessment (HoS). The HoS includes two facilities for Clive that do not exist, without them Clive does not meet the criteria for Community Hub designation. These are:</p> <ul style="list-style-type: none"> <li>-A bowling green, situated within the private grounds of Clive Hall. The green was formerly used by Clive Bowling Club but in May 2018, the owners of the property issued notice to the Bowling Club that the facility was no longer available following sale of the property. This bowling green was not included within the original HoS but was subsequently added. The Parish Council notified Shropshire Council of the error and were assured it would be corrected. However, Shropshire Council argue the Open Space Needs Assessment (OSN) includes the bowling green and it is up to the community to demonstrate it is now surplus to requirements. Although this is demonstrably the case (since the Bowling Club now plays at an alternative green outside the Parish). The Playing Pitch and Outdoor Sports Strategy (PPOSS), supersedes the OSNA and was formally adopted by Shropshire Council in Nov 2020. PPOSS does not include this bowling green. It is therefore unjustified and unsound to allocate points to a facility that, as evidenced by the Council's own documentation, does not exist.</li> <li>-A convenience store, which closed in October 2020. Shropshire Council refused to accept permanent closure had taken place and, further, insisted on submission of a change of use planning application from the property owner (now submitted). However, the Council continues to include points for this non-existent facility. It is therefore unjustified and unsound to allocate points to a facility that does not exist.</li> </ul> <p>Furthermore, the manner in which Shropshire Council has handled changes to local amenities and services throughout the Local Plan Review process has not been consistent across all settlements, despite the Council indicating that this would be the case. When the shop in Myddle closed and the Post Office in Westbury closed the HoS was updated and their settlement status also. No requirement was made for a change of use Planning Application. For Clive, the Council have refused to correct the HoS, deferring action and therefore requiring a main modification and is not effective.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0602	B002	Remove Community Hub status from Clive and update policies and explanations as required.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0602	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	<p>Identification of Community Hubs in draft Policy SP8 is not based on up to date, accurate, or appropriate evidence within the Hierarchy of Settlements Assessment (HoS). Therefore Policy SP8 is not justified and is unsound.</p> <p>The HoS includes two facilities for Clive that do not exist, without them Clive does not meet the criteria for Community Hub designation. These are:</p> <p>-A bowling green, situated within the private grounds of Clive Hall. The green was formerly used by Clive Bowling Club but in May 2018, the owners of the property issued notice to the Bowling Club that the facility was no longer available following sale of the property. This bowling green was not included within the original HoS but was subsequently added. The Parish Council notified Shropshire Council of the error and were assured it would be corrected. However, Shropshire Council argue the Open Space Needs Assessment (OSN) includes the bowling green and it is up to the community to demonstrate it is now surplus to requirements. Although this is demonstrably the case (since the Bowling Club now plays at an alternative green outside the Parish). The Playing Pitch and Outdoor Sports Strategy (PPOSS), supersedes the OSNA and was formally adopted by Shropshire Council in Nov 2020. PPOSS does not include this bowling green. It is therefore unjustified and unsound to allocate points to a facility that, as evidenced by the Council's own documentation, does not exist.</p> <p>-A convenience store, which closed in October 2020. Shropshire Council refused to accept permanent closure had taken place and, further, insisted on submission of a change of use planning application from the property owner (now submitted). However, the Council continues to include points for this non-existent facility. It is therefore unjustified and unsound to allocate points to a facility that does not exist.</p> <p>Furthermore, the manner in which Shropshire Council has handled changes to local amenities and services throughout the Local Plan Review process has not been consistent across all settlements, despite the Council indicating that this would be the case. When the shop in Myddle closed and the Post Office in Westbury closed the HoS was updated and their settlement status also. No requirement was made for a change of use Planning Application. For Clive, the Council have refused to correct the HoS, deferring action and therefore requiring a main modification and is not effective.</p>
A0603	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP4, DP5, DP6 and DP7	Yes	No	Yes	<p>Clauses defining site suitability contain a number of loosely worded definitions which are capable of widely different interpretation e.g. "isolated location", "reasonable access to local services by walking, cycling or public transport", "appropriate access to a school" and "meaningful community engagement". Imprecise definitions such as these are unhelpful both for prospective developers and for development management officers in reaching proper judgements in relation to the suitability or otherwise of exception site proposals. This lack of clarity is likely to lead to speculative applications, inconsistent decision making and in all probability an increase in Appeals. In particular there are inconsistencies between the wording used for site definition in DP5 and the amended definitions in the other policies within this suite of policies.</p>
A0604	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Trefonen (TRF006, TRF008, TRF010, TRF015 and TRF017)	Not Specified	Not Specified	Not Specified	<p>Development of housing on sites TRF006, TRF008, TRF010, TRF015 &amp; TRF017 would have an adverse impact on both the setting of Offa's Dyke (Scheduled Monument (SM)) and the Offa's Dyke National Trail path.</p> <p>Would be very concerned in particular, at the prospect of any development on TRF008, this field contains a section of Offa's Dyke SM along the entire eastern side (inside the hedge-line) and is clearly visible to walkers from the National Trail path. Any development of this field, would be contrary to the guidance laid down in the Offa's Dyke Conservation Management Plan (ODCMP 2018) - which has been adopted by regional authorities along the length of the monument, including Shropshire Council.</p> <p>Would also have very strong reservations in the event of housing development on TRF010, as this would be immediately adjacent to (and overlook) the Offa's Dyke National Trail path.</p> <p>Development on TRF006, TRF015 &amp; TRF017 would not affect the monument as much as TRF008 &amp; TRF010, but would still go against the core principles of the ODCMP.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0602	B003	Remove Community Hub status from Clive and update policies and explanations as required.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0603	B001	All of the clauses defining site suitability should be couched in terms that are, as far as possible, unambiguous.	<p>Noted. The terminology used within these policies is generally consistent with that used in national policy and there is also significant case law available to define such terms as an 'isolated dwelling'. An updated Type and Affordability of Housing Supplementary Planning Document also provides an opportunity to provide further context on these issues, particularly what is meant by 'meaningful consultation'.</p> <p>Ultimately, Shropshire is a diverse county with diverse and distinct settlements and draft Policies DP4 - DP7 need to appropriately reflect this diversity.</p>	No
A0604	B001	N/A	Noted. No sites are proposed for allocation at Trefonen.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0605	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 Trefonen	Not Specified	No	Not Specified	<p>Trefonen cannot reasonably be considered as meeting the requirements of a proposed Community Hub.</p> <p>Consider the methodology used and conclusions reached in the “Hierarchy of Settlements” (HoS) as applied to Trefonen are fundamentally wrong and the village falls well short of fulfilling several of the criteria required for Community Hub status.</p> <p>Previously to qualify as a Community Hub, “significant employment” and “peak time public transport” were required, Trefonen has neither (and is the only proposed Community Hub with neither). This is now relaxed by para 5.41 of the HoS, which undermines proposals relating to climate change and sustainability, introduces a subjective element into an objective assessment and leads to the conclusion that some aspects of HoS are unsound.</p> <p>Other factors which demonstrate the HoS has not been correctly applied in Trefonen include:</p> <ul style="list-style-type: none"> <li>-The library is a mobile library with short fortnightly visits, this cannot be considered a full service. Note that TRF001 and TRF017 score 0 within the site assessment for access to library, showing two different and contradictory assessments.</li> <li>-There is no “convenience store”, rather there is a very small shop which has a Post Office counter within it.</li> <li>-Whilst there is a primary school, it is understood that there is little or no capacity for additional pupils.</li> </ul> <p>In addition to the above, consider Trefonen should not be a Community Hub as it is in the wrong place. Community Hub status would cause significant residential development pressure, with residents (apart from retirees), needing jobs. The main focus for jobs in the Oswestry area is the other site of town (near Mile End Roundabout). This and job locations further afield (Wrexham, Shrewsbury, Chester etc) all require travel through/round Morda in private vehicles (often single occupied) on heavily trafficked unclassified roads. Makes no sense to identify a Community Hub that will significantly increase existing traffic problems in and around Oswestry at peak hours</p> <p>Identification of Trefonen as a Community Hub is contract to draft Policy SP3 and Sustainability Appraisal (SA) objectives SO5, SO6, &amp; SO12.</p> <p>Parish Council have consistently indicated wish for Trefonen to remain classified as countryside, which allows for 100% affordable small scale rural exception development for identified local needs (reflecting the Trefonen, Treflach and Nantmawr VDS (2016) and the Council’s Housing Needs Survey (2018)).</p> <p>Proposed for an additional 50 houses in Trefonen during the proposed Plan period cannot be considered modest growth the context of the built community of Trefonen and would constitute overdevelopment.</p> <p>Consider sites at Trefonen (including TRF 001, 006, 008, 009, 010, 015 &amp; 017) identified as having long-term potential within the Strategic Land Availability Assessment (SLAA) are entirely unsuitable for residential development, for reasons including location, access, traffic, flooding and drainage, geology/geomorphology, heritage, preservation of the rural environment, landscape character and ecology.</p>
A0606	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation.</p> <p>Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.</p>
A0606	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth.</p> <p>Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a.</p> <p>The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth.</p> <p>Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.</p>
A0606	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	Not Specified	No	Not Specified	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not “contribute to meeting local needs” or to “making settlements more sustainable” as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0605	B001	Trefonen should not be identified as a Community Hub, rather it should be classified as countryside (associated changes to the draft Shropshire Local Plan should be undertaken). If retained as a Community Hub, reduce the proposed residential guideline.	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment. As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub. With regard to the proposed local housing requirement, it is considered appropriate to review the position having regard to consistency with other similarly scaled community hub settlements, as well as the likelihood of delivery over the plan period, having taken account of the overall net requirement remaining to be delivered over the remainder of the plan period, and that it has not been considered appropriate to allocate any land in the village due to site constraints identified through the SLAA process. It is therefore proposed to include a minor modification to the Plan to reduce the gross housing requirement for the village from 55 to 35 dwellings. It is considered this requirement will be met by: Suitable infill development within the defined development boundary; single plot and larger affordable housing exception schemes, potentially outside the development boundary but on sites well related to the village; and Cross-subsidy exception schemes (at least 70% affordable housing), potentially outside the development boundary but on sites well related to the village.	yes
A0606	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0606	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0606	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0606	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0606	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0606	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 & S3: Bridgnorth	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not consistent with each other regarding poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue.
A0606	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3 (BRD030)	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. It should be noted that the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0606	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0606	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0606	B006	Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing. Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences. Provide details of how noise and odour can be mitigated in these circumstances.	Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection. Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity. Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market. Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.	No
A0606	B007	Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored. Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.	Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0606	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030). At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '.. will make provision for the needs of the town and surrounding hinterland...'? In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?
A0606	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them. The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.
A0606	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable?
A0606	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458. Clarification required on feasibility of this or alternative means of achieving safe crossing points.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0606	B008	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0606	B009	<p>The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p>	<p>Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."</p>	No
A0606	B010	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p>	<p>Noted. Shropshire Council has undertaken an Economic Development Needs Assessment and Employment Land Review to inform the Local Plan Review. The Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Specifically with regard to employment land, this proposed strategy provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Having a supply of land which creates choice and competition in the market provides flexibility to respond to changing circumstances.</p> <p>Employment allocations are specifically allocated for employment purposes. Draft Policy SP13 indicates that allocated employment land will be protected for employment generating uses and alternative uses will only be supported in specific circumstances, as documented within the draft Policy.</p>	No
A0606	B011	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0606	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 specifies development can only occur where there is sufficient infrastructure capacity available or where the development funds necessary improvements to infrastructure through a suitable developer contribution. What contributions are required of BRD030 and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 recognises businesses and communities require quality broadband provision/mobile network connectivity and also states development proposals will be expected to provide infrastructure for broadband and mobile communications as essential utilities. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0606	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 and S3 (BRD030)	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0607	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	Yes	Not Specified	Policy SP7 recognises the importance of the residential guidelines for settlements, set out in Policies S1- S20 as an important policy consideration in managing future developments. It reflects the importance of settlement policy boundaries in strictly controlling development. This Policy is consistent with the Shropshire Test set out in Policy SP1 and the Strategic Approach in Policy SP2 which together support the NPPF's approach to significantly boosting housing supply whilst reflecting the unique character across Shropshire's urban and rural settlements through appropriate application and distribution of development across a settlement hierarchy. Removal of development boundaries or flexible application of the housing guidelines as a minimum could lead to uncontrolled and unsustainable development thereby conflicting with other policies within the Plan.
A0607	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	The policy identifies Community Hubs as significant rural service centres but it is unsound in its application as it is not based on up to date or accurate evidence and the treatment of changes to local services and facilities throughout the Plan's development has been inconsistent. The Hierarchy of Settlements (August 2020) supports the Local Plan Review and Policy SP2, by setting out the methodology for identifying Shropshire's service centres. This is to provide Policy SP2 with specific and consistent criteria about Shropshire's settlements and their sustainability. Para 2.6 of the August 2020 version of the Hierarchy of Settlements states the need to keep this evidence up to date with best available information about changing local facilities, services and infrastructure, including feedback from previous consultation on the Local Plan Review and informal consultation with representatives of the local communities. However, despite consultation responses highlighting changing evidence on the availability of local facilities in some of Shropshire's settlements, including the most recent Regulation 18: Pre- Submission Draft of the Local Plan (August 2020- September 2020), Policy SP2 does not take these into account. Previous formal and informal consultations on the Local Plan Review have repeatedly highlighted the misidentification of available local services for the village of Clive. However Clive remains under Policy SP2 as a Community Hub and deemed a 'significant rural service centre' but without the actual presence of the necessary associated services and facilities to support this. This raises significant concerns about the soundness of the application of the Hierarchy of Settlements evidence base in the development of the Regulation 19 Plan and the application of a consistent approach cross the whole of the Plan area. For example, the village of Myddle, like Clive, was initially identified as a Community Hub but following closure of the local convenience store in summer 2018, the evidence base was reviewed and it was determined that the village fell below the threshold to be considered a 'significant rural service centre'. The same consistent application of this methodology has not been applied to the village of Clive, despite falling under comparative circumstances with a closure of a local convenience store. The village thereby also falls below the threshold for a Community Hub. This was raised with Shropshire Council by the Parish Council, local residents and indeed the shop owner during the Regulation 18 consultation stage but the Regulation 19 Plan remains unchanged, rendering Policy S2.2 unsound as it is not justified and based upon out of date evidence.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0606	B012	Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030. Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision. Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators." Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.	No
A0606	B013	Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional. Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat. Explain the measures to be taken to improve air quality in Bridgnorth. Explain how noise and odour will be mitigated. Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?	Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal. Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology. Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.	No
A0607	B001	n/a	Noted.	No
A0607	B002	Policy SP2 should remove reference to Clive as Community Hub as current evidence on availability and accessibility of local facilities and services means it does not meet the definition of a significant rural service centre as defined by the Hierarchy of Settlements evidence base and subsequent Local Plan policies.	Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive. With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility. With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub. Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0607	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	No	Not Specified	HoS is inaccurate. Clive's coring is wrong. Bowling Green is not available to the community, neither is the local convenience store (both are closed). Other settlements have had their scores adjusted based on changes, Clive has not. The Hierarchy of Settlements evidence base and Local Plan Policies are now based on inconsistencies which render them unsound. Revisions to the Hierarchy of Settlements evidence base over the Plan development has led to relaxation around the requirement for Community Hubs to have employment and peak time public transport, which should be fundamental to the determination of 'significant rural service centres'. As a result, there are now inconsistencies in the policy, with the definition of Community Hubs continuing to be set out as 'settlements considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities' but the assessment criteria and associated threshold no longer require such facilities to be present. This is illustrated by the example of Clive which when assessed clearly doesn't meet the criteria for a Community Hub in that there is a reliance upon other settlements to meet day to day needs such as employment and local convenience goods. The Plan and Policy SP8 is therefore considered to be unsound as the methodology and application of associated evidence does not meet the intended definition of a Community Hub and the overall settlement hierarchy needed to maintain sustainability and is therefore not justified
A0607	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	Not Specified	No	Not Specified	Although Policy SP15 provides a framework for a long term vision of estate land within Shropshire, it is considered to be unsound because it does not recognise its relationship to other policies in the Plan and does not set out a framework for how this Policy relates to other policies in the Plan. It is therefore not considered effective. This Policy needs to be clear on the relationship between other rural settlements in the Plan, particularly Community Hubs. Without being specific on the relationship to Policy SP8, the Policy provides no framework for development for rural areas and poses the risk of the spreading and merging of development between the defined development boundaries of Community Hubs and neighbouring estate land. This would significantly increase housing numbers beyond the housing guideline for these settlements which has been set and consulted upon as the most appropriate on sustainability and character grounds. The Policy needs to reflect the distinction between Community Hubs and Estate Land to ensure these policies work in harmony and do not result in inappropriate rural development.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0607	B003	Policy SP8 should remove reference to Clive as Community Hub as current evidence means it does not meet the definition of a significant rural service centre as defined by the Local Plan Review	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive. With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirements to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0607	B004	Policy SP15 should explicitly reflect the relationship to Policies SP8, making clear that any land within whole estate plans falling within defined Community Hubs or Clusters needs to be consistent with the relevant settlement policy requirements and those of SP7 in relation to housing guidelines and development boundaries.	<p>Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal.</p> <p>Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0607	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2	Not Specified	No	Not Specified	S17.2 is based on inaccurate evidence which is out of date. Scoring is incorrect for Clive – the bowling green and shop do not exist. Removal of these will result in Clive scoring too low for hub status. Other settlements have been updated based on recent data, Clive has not.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0607	B005	<p>Policy SP17.2 should remove reference to Clive as Community Hub as current evidence on availability and accessibility of local facilities and services means it does not meet the definition of a significant rural service centre as defined by the Hierarchy of Settlements evidence base and subsequent Local Plan policies.</p>	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0608	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1	Not Specified	Not Specified	Not Specified	<p>Welcome and strongly support proposed allocation SHR173. This site has been continuously promoted at all stages of the plan making process and thorough engagement within the Council has been undertaken. Location Plan, Illustrative Framework Plan and Vision Statement (underpinned by technical analysis and assessment including in relation to minerals, highways, landscape, heritage and ecology) for the site appended to the representation. This confirms SHR173 is suitable, available and achievable for delivering a sustainable residential development. It is expected to deliver housing in accordance with identified policy requirements.</p> <p>Whilst the specified capacity of SHR173 is 450 dwellings, the Illustrative Framework Plan demonstrates it has capacity to accommodate up to 500 dwellings, whilst also providing requisite infrastructure such as play areas, strategic green space and wildlife ponds. The requirement of a local centre on at least 0.25ha of the site is not yet reflected in the Vision Document, however SHR173 could still accommodate up to 500 dwellings without altering wider development parameters. There is no reason to artificially restrict the capacity of SHR173 (especially following delivery of the North West Relief Road (NWRR)). As such, consider capacity should be increased to 500 dwellings, this extra provision would contribute to delivery of the recognised housing needed over the proposed Plan period and would be in accordance with para 122 of the National Planning Policy Framework regarding efficient use of land/site densities.</p> <p>Broad principles of the draft site guidelines for SHR173 are supported, including provision of a local centre, although would welcome flexibility within the draft Policy wording to enable this to more easily provided as a single retail outlet in place of a 'local centre', to maximise attractiveness and suitability to potential retail operators.</p> <p>However, substantive concern with the draft site guidelines is that restricting commencement until the NWRR is operational (also in para 5.225 of the explanation to draft Policy S16.1). This is unnecessary, not wholly justified and there are a number of policies within the draft Shropshire Local Plan that the Site's development will support, along with the appropriate level of housing delivery. Government funding has been granted to the NWRR and a Planning Application recently submitted for the scheme (including a construction timetable indicating it will be fully operational in Spring 2024). A Highway Technical Note for SHR173 (appended to the representation) demonstrates up to 100 dwellings can immediately come forward prior to the NWRR being operational, without having a significant adverse impact on the current highway network. The Note suggests the figure could be higher, but additional delivery would need to be supported by post Covid surveys and detailed capacity assessments. As a minimum, therefore, consider the draft site guidelines for SHR173 should be amended to allow for up to 100 dwellings to be delivered without restrictions related to the NWRR being operational.</p> <p>However given the overall commentary on the NWRR timetable and site delivery expectations, evidence for the need for any Plan based restriction on delivery is unclear. Specifically, a reasonable scenario for delivery would be: a Planning Application in Autumns 2021; subject to their being no material objections to the proposed allocation, Outline Permission granted in Spring 2022; Reserved Matters granted by the end of 2022; construction commencing in Spring/Summer 2023 (taking 2 years to deliver beyond the minimum 100 dwelling threshold identified in the Highway Technical Note). The NWRR would be fully operational by Spring 2024, therefore in practice the restriction proposed by the allocation will serve no useful purpose. Important that any trigger relating to the NWRR being operational is linked to occupation of dwellings rather than commencement of development. Site guidelines require preparation and adoption of a masterplan for SHR173 prior to determination of any planning application for it. This is not necessary for the effective delivery of a sustainable residential development. Instead, the site guideline should be amended to specify a comprehensive masterplan should be submitted as part of a planning application that has been demonstrably informed by public consultation and engagement. This will alleviate delays, would not materially change/influence the decision making process and would be entirely consistent with Government's drive for delivery and boosting the supply of housing.</p> <p>Site guidelines for SHR173 require either on or off-site contributions to the delivery of additional playing pitch provision in line with the Council's Playing Pitch and Outdoor Strategy. However, the published evidence base contains only a Shropshire Council Action Plan and Shropshire Council Playing Pitch &amp; Outdoor Sports Strategy Executive Summary. It should be clear which document is referenced or this guideline deleted. If retained the guideline should be amended to indicate such provision is where necessary and identified as part of the Council's Playing Pitch and Outdoor Strategy.</p> <p>Consider the forecast for delivery of SHR173 are too protracted. Delivery is expected to occur in the Short-Term (200 dwellings) and Medium-Term (300 dwellings). This needs to be recognised so as not to artificially constrain the appropriate delivery of housing.</p>
A0608	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	Site SHR173 will contribute to the proposed housing requirement for Shropshire and reinforce the proposed strategy for additional growth to be located at the highest level of the settlement hierarchy, which is supported, and in accordance with the Shropshire Council Hierarchy of Settlements.
A0608	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Not Specified	No	Not Specified	<p>Within draft Policy SP3 the minimisation of travel and encouragement of public transport, delivering higher density development and encouraging new development to link and where possible integrate with public transport is supported; as detailed in Parts 1a, 1b, and 1e respectively.</p> <p>Parts 1g and 2a of draft Policy SP3 make reference to promoting fabric energy efficiency and integrating renewable/low carbon energy, in line with draft Policy DP11. As per para 34 of the National Planning Policy Framework (NPPF), these requirements should not undermine deliverability of the Plan. Further, policy should not duplicate legal requirements covered elsewhere and changes have already been made to building regulations to achieve energy efficiency standards. These parts of the policy should instead defer to the latest building regulations. Any requirement that goes beyond building regulations should be on a needs only basis, informed by detailed evidence.</p> <p>Part 3a of draft Policy SP3 should be clarified as being an optional requirement.</p> <p>This policy should be amended to reflect the above in order to be found sound, be fully justified and compliant with national policy.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0608	B001	<p>The capacity of proposed allocation SHR173 should be increased from 450 dwellings to 500 dwellings.</p> <p>Amend the site guideline restricting commencement of SHR173 until the North West Relief Road (NWRR) is operational to either: 1. Remove this restriction in its entirety; or 2. Allow for up to 100 dwellings to be occupied prior to delivery of the NWRR, with additional delivery beyond this subject to the outcome of detailed capacity assessments of the local road network. Occupation of remaining dwellings should follow the operational opening of the North West Relief Road."</p> <p>Amend the site guideline regarding the need for a Masterplan to be prepared and adopted for SHR173 prior to any decision on a Planning Application for the site to specify a comprehensive masterplan should be submitted as part of a planning application that has been demonstrably informed by public consultation and engagement.</p> <p>Site guidelines for SHR173 require either on or off-site contributions to the delivery of additional playing pitch provision in line with the Council's Playing Pitch and Outdoor Strategy. Unclear which document is referenced, this should be clarified or the guideline deleted. If the guideline is retained it should be amended as follows "Where identified as part of the Council's Playing Pitch and Outdoor Strategy, and where necessary, either on or off site contributions are made towards the delivery of additional playing pitch provision."</p> <p>Delivery timescales for SHR173 within Appendix 7 need to be amended to indicate delivery in the Short-Term (200 dwellings) and Medium-Term (300 dwellings).</p>	<p>Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury, including the proposed development guidelines for Site SHR173 are appropriate and will contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.</p> <p>Furthermore, the developer guidelines have been through several stages of public consultation and have been confirmed by the promoter to be viable for delivery.</p>	No
A0608	B002	N/A	Noted.	No
A0608	B003	<p>Amend Part 1g of draft Policy SP3 to replace "in line with the requirements of DP11" with "in line with the relevant Building Regulations".</p> <p>Amend Part 2a of draft Policy SP3 to replace "in line with the requirements of DP11" with "in line with the relevant Building Regulations".</p>	The Council considers that the Building Regulations are complementary to the Local Plan and that draft Policy SP3 reflects this relationship appropriately.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0608	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Not Specified	No	Not Specified	<p>This policy needs to be amended to be found sound:</p> <ul style="list-style-type: none"> <li>-Part 5 of draft Policy SP5 is negatively worded and should be more balanced - for instance where development positively demonstrates design principles being incorporated then planning permission will be granted.</li> <li>-The proposed explanation of draft Policy SP5 requires planning applications to demonstrate how they comply with the West Midlands Design Charter, however this is not intended to set local design policy and has not been subject to the same process of preparation, consultation and examination as the draft Shropshire Local Plan.</li> <li>-Note there is no reference to the National Design Guide (October 2019) which has significantly more material planning weight than a regional design guide. This also follows into the draft National Model Design Code (currently subject to consultation), which is expected to inform local design guides, codes and policies and therefore would be useful to reference along with the DfT Cycle Infrastructure Design Guide.</li> <li>-Needs to be fully justified against national design guidance with references made to it, and more balanced in its overall approach to appreciate where good design principles have been adhered to.</li> </ul>
A0608	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Not Specified	No	Not Specified	Draft Policy SP6 requires major applications be accompanied by a proportionate Health Impact Assessment (HIA). However, HIAs require a screening and scoping process, and not all developments will require one. A HIA can be in the form of an Intermediate HIA or Rapid HIA. Therefore, draft Policy SP6 should make clear that major developments would be required to screen/scope the need for a HIA and that these can either be intermediate or rapid submissions. As such this draft Policy should be amended to be found sound.
A0608	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Not Specified	Not Specified	Not Specified	Support draft Policy SP12 as it recognises the role of Shrewsbury, within the settlement hierarchy and the need to balance employment growth alongside new housing developments to support an expanded workforce. The two go hand-in-hand, and sustainable growth is achieved when the desire and aspiration of a new workforce are satisfied by a complementary housing market.
A0608	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP16	Not Specified	Not Specified	Not Specified	<p>SHR173 is included within a mineral safeguarding area for sand and gravel. A Mineral Resource Assessment report has been prepared for the site (appended to this representation), which demonstrates minerals cannot be extracted from this Site in an economically viable way, and is constrained further by existing residential properties, the railway line and a gas pipeline. Also prior extraction is infeasible.</p> <p>The report also demonstrates there is an abundance of high-quality Sand &amp; Gravel deposits within the County and that the seven-year landbank required by the National Planning Policy Framework has been exceeded.</p> <p>As such safeguarding SHR173 for mineral extraction would be inappropriate to take forward within the draft Shropshire Local Plan.</p>
A0608	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	No	Not Specified	<p>Part 6a and 6b of draft Policy DP1 should include "where need is demonstrated," at the start of each sentence.</p> <p>In order for this policy to be reasonably applied and found sound, it needs to be justified through preparation of needs assessments to evidence the specialist and specific types of properties sought. Without this, the viability evidence required to underpin the policy is not robust and potentially places an unreasonable financial burden upon developments as build costs are higher due to specific design criteria to serve older people. This policy should, therefore, be amended to include 'where need is demonstrated' to be found sound, be justified and compliant with national policy.</p>
A0608	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Not Specified	Not Specified	Not Specified	<p>The sentiment of prescribing that 10% of plots on sites of 10 or more dwellings are for self-build purposes is supported. However, suggest the spatial strategy that underpins this amended. The Home Builder Federation (HBF) consider self-build customers seeking self-build opportunities seek smaller more rural sites rather than serviced plots within a larger strategic allocation. Suggest rural housing sites are encouraged to be proposed as self-build sites, which may be more attractive and thus more deliverable/achievable, resulting in a successful policy.</p> <p>Furthermore, the National Planning Policy Framework (NPPF) indicates regard should be given to the self-build register and give enough suitable development permissions to meet identified demand. The NPPF does not however provide a specific percentage of self-build plots to be provided. Draft Policy DP2 should be amended to solely reference the Self-Build Register in order to be found sound. There is no justification for the prescribed level of 10% serviced plots and as it currently reads is not compliant with national policy.</p>
A0608	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	Not Specified	Not Specified	<p>Support the requirement for 10 or more dwellings or sites of 0.5ha or more to provide 10% affordable housing in the north of the District.</p> <p>Also support that reduced rates of affordable housing will be considered in exceptional circumstances, where evidence is presented demonstrating viability concerns.</p> <p>Part 1j of draft Policy DP3 states affordable housing will be allocated in accordance with Shropshire Council's Allocation Policy. Assume this is the Shropshire Affordable Housing Allocation Policy and Scheme (March 2014). However, the purpose of this document is to determine the degree of housing need and priority for Registered Providers and Landlords, for the benefit of applicants on the Housing Register. Reference to the Shropshire Council's Allocation Policy should be removed as it is not relevant to planning as the primacy of this policy is to secure affordable housing, rather than advise how it should be allocated, and to whom, thereafter.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0608	B004	Part 5 of draft Policy SP5 should be amended to state "where development positively demonstrates design principles being incorporated then planning permission will be granted." Reference to the West Midlands Design Charter should recognise that this is not intended to set local design policy and has not been subject to the same process of preparation, consultation and examination as the draft Shropshire Local Plan. Specific reference should be made to the National Design Guide (October 2019), draft National Model Design Code and the DfT Cycle Infrastructure Design Guide. Draft Policy SP5 needs to be fully justified against national design guidance with references made to it, and more balanced in its overall approach to appreciate where good design principles have been adhered to.	Noted. Shropshire Council considers that draft Policy SP5 is fully justified and consistent with national policy and guidance. It is considered appropriate to clearly state that planning permission will be refused for development of poor design and that fails to take the opportunities available for improving the character and quality of an area, the way it functions where it would adversely affect the well-being of others and where inadequate information has been submitted to demonstrate how new development will ensure the quality of design. Shropshire Council has adopted the West Midlands Design Charter as a material consideration to inform planning decisions and to inform policy development, notably the review of the Local Plan. The West Midlands Design Charter is not intended to set local design policies but seeks to provide a clear and consistent understanding of the West Midlands' place-making expectations, create a level playing field for developers across the region, to define 'good design quality' and indicate what is expected from developers when planning applications are submitted. As such it is considered appropriate to expect all planning applications for new development to set out how they comply with Policy SP5, the principles of the West Midlands Design Charter and comply how they comply with the design requirements of the other policies contained in this Local Plan. Draft Policy SP5 specifies that development must maintain and enhance the character, appearance and historic interests of settlements, streetscenes, groups of buildings, individual buildings and the landscape and, reinforce the hierarchy of networks and spaces in accordance with national planning policy. However for the sake of clarity a minor modification is proposed to also reference national guidance.	Yes
A0608	B005	Draft Policy SP6 should make clear that major developments would be required to screen/scope the need for a HIA and that these can either be intermediate or rapid submissions.	The Council considers that the screening and scoping stages of HIA are integral to the process and there is no need to make specific reference to this in the policy. No change proposed.	No
A0608	B006	N/A	Noted.	No
A0608	B007	Respectfully request proposed allocation SHR173 be excluded from the need to be safeguarded further with a Mineral Safeguarding Area, as the Mineral Resource Assessment prepared demonstrates extraction of minerals on the Site would be unpractical and unviable; and is in compliance with the Minerals Plan and its release for development would not conflict with it.	Noted. Proposed allocations, including SHR173, have been informed through a proportionate and robust site assessment process, which included consideration of mineral safeguarding. Ultimately site SHR173 has been proposed for allocation and para 4.264 of draft Policy DP29 (to which draft Policy SP16 cross-references in the context of mineral safeguarding) states "Non-mineral development which is exempt from the requirements of this Policy comprises:... Applications that are in accordance with the development plan and site allocations where the assessment of site options took account of potential mineral sterilisation and determined that prior extraction was not required".	No
A0608	B008	Part 6a and 6b of draft Policy DP1 should include "where need is demonstrated," at the start of each sentence.	Noted. A Strategic Housing Market Assessment (SHMA) has been undertaken to inform the draft Shropshire Local Plan, this is considered a comprehensive and robust assessment of housing need. With regard to specialist designed housing for older people, the SHMA projects that over the Local Plan period, there will be a need for around an additional 3,500 specialist older persons accommodation units and around 2,500 additional units of residential care provision. It is recognised that sites of 50 or more dwellings will be diverse in nature and it is for this reason that a specific type/quantity of these properties is not specified. This provides appropriate flexibility to respond to site specific/location specific factors.	No
A0608	B009	Draft Policy DP2 should be amended to solely reference the Self-Build Register in order to be found sound.	Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position. It is considered that the proposed approach within draft Policy DP2, alongside other relevant policies relating to residential development in the draft Shropshire Local Plan, will effectively meet the diverse need for self-build and custom-build development. It is important to note that open market self-build and custom-build development is a form of open market residential development. It is also important to note that Shropshire is already delivering significant volumes of self-build plots, using a policy approach which is generally consistent in relation to small sites, whilst the proposed approach in relation to large sites creates an opportunity to complement this provision both in terms of numbers and types of plots, again to effectively meet the diverse need for self-build and custom-build development.	No
A0608	B010	Reference to the Shropshire Council's Allocation Policy should be removed as it is not relevant to planning as the primacy of this policy is to secure affordable housing, rather than advise how it should be allocated, and to whom, thereafter.	Noted. Shropshire Council considers that it is appropriate to specify that affordable housing provided onsite will be allocated in accordance with Shropshire Councils Allocations Policy.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0608	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	No	Not Specified	<p>With regard to the requirements of draft Policy DP11:</p> <p>-As stated in para 34 of the National Planning Policy Framework (NPPF), requirements for fabric energy efficiency, minimum energy performance requirements and low carbon energy systems should not undermine the deliverability of the Plan.</p> <p>-There is no justification for why 10% of energy needs is required to come from onsite renewable and low carbon energy sources. As long as power comes from renewable and low carbon sources, it should not matter whether this is sourced on or off-site. Para 151 of the NPPF promotes use and supply of renewable and low carbon energy and heat, but does not specify this must be met onsite. Therefore, this policy is not justifiable as the delivery mechanism should be flexible to enable developers to provide their own solutions rather than providing onerous requirements that are too prescriptive and may stifle development from being delivered.</p> <p>-District wide heating/cooling systems, may be unsuitable as they may be unreliable, expensive, may also attract high management and repair costs, the prevalent technology is gas combined heat and power plants and some customers are less satisfied than standard gas/electricity customers. Given there are other options such as solar and alternative off-site generation of carbon neutral energy, which may be more reliable maintenance free, there is no justification for an emphasis on on-site district heating.</p> <p>-Building regulations (recently updated with regard to energy efficiency standards) already considers the energy efficiency of buildings and this policy, as worded, adds no material value and will potentially stymie development that accords with government/building regulation standards. Any requirement that goes beyond building regulations is unsound or must be full justified - informed by detailed evidence, as to viability, when evidenced with the objectives of the Plan when read as a whole.</p> <p>-The policy should be flexible, not prescriptive, so that it can keep pace with technology which is dynamic, whilst the local plan process is not. It should reflect the flexible nature of low carbon energy sources and should not direct developments to a specific type, whether on or offsite, which may in fact be less 'green' than alternatives available.</p>
A0608	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Not Specified	Not Specified	Not Specified	<p>Part 1 of draft Policy DP12 identifies a requirement that development which has a significant effect on an internationally designated sites should be subject to a project level Habitats Regulations Assessment (HRA). Consider that for site allocations, this requirement should be specifically identified as part of the development guidelines of an allocation, to provide further clarity.</p> <p>Part 3 of draft Policy DP12 requires 10% net gain for biodiversity, referencing the Environment Act. However, the Environment Act (1995) does not require this. The proposed explanation to this draft Policy refers to the Environment Bill that has yet to achieve royal assent, as such it may be subject to change and cannot be relied on. Para 174b of the National Planning Policy Framework (NPPF) promotes identification/pursuit of opportunities to secure measurable net gain for biodiversity in Local Plans, however para 34 of the NPPF indicates requirements must not undermine viability. Therefore, any request for biodiversity gain must be made through a proportionate and detailed evidence base.</p>
A0608	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP14	Not Specified	Not Specified	Not Specified	<p>Support aim of maximising green infrastructure and expanding the current network. However, it should be recognised that existing local strategies, such as the Shrewsbury Big Town Plan that has a vision for Green Networks across Shrewsbury, must accord with the Development Plan which takes precedent as policy. Where there is conflict, the Development Plan will provide the prevailing policy.</p>
A0608	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP15	Not Specified	Not Specified	Not Specified	<p>Delivery of quality open space is considered an essential part of new development and is supported in principle.</p> <p>Expectation in draft Policy DP15 that for new housing development open space provision will equate to 30sqm per person, assuming one person per bedroom. However, the policy also allows for a reduced level where provision is particularly high-quality which meets the needs of all residents. Consider clarity is required with regard to the meaning of 'good' quality open space, 'high' quality open space is delivered and what developments are expected to deliver.</p> <p>Example is provided (Epping Forest) where their Green Infrastructure (GI) Strategy notes GI provision is often based on individual typologies (often bland spaces that do not encourage people to use the,) and wider benefits through provision of multifunctional spaces are missed. Therefore the quality of GI is as important as the quantity of GI, whilst recognising that the quantity of provision forms the backbone of many typologies - but there will be occasions, particularly where there are deficiencies in the quality rather than the quantity of a typology, that greater benefits can be achieved by investing in existing spaces rather than in creating additional space. Therefore, an approach that simply follows space standards is not enough.</p> <p>Suggest a flexible approach is taken to open space by the Council, similar to the Epping Forest example above, where well developed schemes can positively help in meeting the requirements for open space and rigid adherence to formulaic standards have the potential to stifle good design.</p>
A0608	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP16	Not Specified	No	Not Specified	<p>Draft Policy DP16 should be amended in order to be found sound, be fully justified, effective and compliant with national policy:</p> <p>Part 2 of draft Policy DP16 should be amended to reference minimising harm rather than avoiding harm to existing features of landscape or ecological value or with heritage significance. With reference to heritage and conservation, the degree of harm and the importance attached to it should be consistent with Chapter 16 of the National Planning Policy Framework (NPPF), which requires the harm to the significance of any heritage asset to be taken into account.</p> <p>Part 6 of draft Policy DP16 regarding trees within adoptable areas should be amended to recognise that tree planting on adoptable areas will require County Highways agreement.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0608	B011	<p>Within draft Policy DP11:</p> <ul style="list-style-type: none"> <li>-Remove requirement that all proposals for the formation of one or more dwellings generates 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources.</li> <li>-Remove the strong encouragement for sites of 50 or more dwellings to maximise the use of on-site district heating and cooling systems, especially where these utilise renewable energy.</li> <li>-Remove the requirement for all proposals for 10 or more dwellings achieve a minimum of 19% improvement in the energy performance requirement in Part L of the 2013 Building Regulations, until such time as the Building Regulations are increased to a level which exceeds this uplift.</li> </ul>	<p>Subsection 1 (a) of the 2008 Planning and Energy Act states that Local Planning Authorities may include policies imposing reasonable requirements for 'a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development', provided these are consistent with national policy. National policy is the 2015 Written Ministerial Statement which allows Local Planning Authorities to set Code for Sustainable Homes level 4 energy standards. The policy reflects this standard. No change proposed.</p> <p>Although the government announced its intention to amend Subsection 1 (c) of the 2008 Planning and Energy Act in 2015 - which states that Local Planning Authorities may include policies imposing reasonable requirements for 'development in their area to comply with energy efficiency standards that exceed the energy requirements of the building regulations' - these amendments have not yet been enacted. The intention of the amendment was to introduce higher energy performance requirements through building regulations, rather than the planning system. The performance increase was expected to be a 19% improvement. This improvement is also referenced in national policy through the 2015 Written Ministerial Statement - being equivalent to the Code for Sustainable Homes level 4 energy criteria which the Statement permits. However, the government's 2015 Productivity Plan subsequently stated that 'the government does not intend to proceed with .....the proposed increase in on-site energy efficiency standards, but will keep energy efficiency standards under review recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.' Recent government consultations on the Future Homes Standard and Future Buildings Standard indicate that such a review is ongoing with the outcome forming part of changes to Part L of the Building Regulations. However, these changes have not yet been made. Thus the Council believes that the powers afforded to LPAs through the 2008 Planning and Energy Act to set energy efficiency standards in new homes still exist and that this policy's requirements are appropriate. Provision is also made in the policy for higher Building Regulations standards to apply if/when these are implemented. No change proposed.</p>	No
A0608	B012	Draft Policy DP12 should be amended to reflect a strategy that accords with the emerging direction of national policy but does not exceed it.	<p>The Queens Speech of 11th May 2021 indicated Government's intention to introduce the Environment Bill in the upcoming Parliamentary year. The key element of the Environment Bill is at least 10% biodiversity net gain. The Council is confident that this will be carried forward into law and that it is appropriate to include it in Policy DP12 to give clarity to developers, communities and the decision maker on requirements.</p> <p>This requirement has been given due consideration as part of the Viability Assessment undertaken to inform the draft Shropshire Local Plan. Therefore no amendment is proposed.</p>	No
A0608	B013	Recognise that existing local strategies, such as the Shrewsbury Big Town Plan that has a vision for Green Networks across Shrewsbury, must accord with the Development Plan which takes precedent as policy. Where there is conflict, the Development Plan will provide the prevailing policy.	Noted. The draft Shropshire Local Plan, if adopted, would represent the starting point for decision making in accordance with Planning law, but that the specific proposals within or resulting from the Big Town Plan would be material in decision making.	No
A0608	B014	Suggest a flexible approach is taken to open space by the Council, similar to the Epping Forest example (see summary of main issues), where well developed schemes can positively help in meeting the requirements for open space and rigid adherence to formulaic standards have the potential to stifle good design.	The Council considers that this policy approach provides consistency and certainty to developers and notes that Draft Policy DP15 provides appropriate flexibility in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents. No change proposed	No
A0608	B015	<p>Part 2 of draft Policy DP16 should be amended to reference minimising harm rather than avoiding harm to existing features of landscape or ecological value or with heritage significance.</p> <p>Part 6 of draft Policy DP16 should be amended to state "Trees within adoptable areas should be, where practical and in agreement with County Highways, incorporated as part of the infrastructure planning and design stage in accordance with current best practice".</p>	Paragraph 2 of Policy DP16 requires landscaping to be in accordance with Policy DP23, the Historic Environment, so the Council considers the proposed amendments are not necessary. The Council also does not consider the proposed change to paragraph 6 to be necessary.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0608	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP20	Not Specified	No	Not Specified	If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, as specified within draft Policy DP20, then this should be justified against the criteria in National Planning Policy Guidance (ID 56-013-20150327 to 56-017-20150327). Also, under current Building Regulations, all new dwellings achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. Expectation of a programme of water efficiency promotion and consumer education in draft Policy DP20 is not required if minimisation of water use through the development construction is being implemented. This part of the policy requires further justification and clarity as to what this entails and how long it is expected for. This policy should be amended to provide further justification and clarity in order to be found sound, needs to be positively prepared so it can be fully justified and effective.
A0608	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP21	Not Specified	Not Specified	Not Specified	Draft Policy DP21 is supported as it does not require sequential tests to be provided for allocated sites, unless the use proposed is not in accordance with the Plan, with further detail provided within Development Guidelines for allocated sites. However, the wording of para 2a of draft Policy DP21 should be tweaked to read: "a. Development on land allocated in this plan, unless the use of the site is not in accordance with the use specified in this Plan and falls within Flood Zones 2 and/or 3."
A0608	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP22	Not Specified	No	Not Specified	Part 5 of draft Policy DP22 requires an additional unspecified, allowance to reduce impact of urban creep (noting guidance for this is provided by the Lead Local Flood Authority (LLFA)). However, it is not clarified what the guidance is and places an onus upon the LLFA to engage with developers at the pre-submission stage. Clarity should be provided by more specific reference to the guidance within the policy in order for the draft Policy to be fully justified, viable and found sound.
A0608	B019	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23	Not Specified	No	Not Specified	Heritage policy is clearly set out in the National Planning Policy Framework (NPPF). There is a significant risk paras 1-4 of draft Policy DP23 are seeking to reframe the language of national policy. Whilst there is a need for a historic environment policy as part of the local plan, this need only comprise paras 2 and 3 of draft Policy DP23. Part 7 of draft Policy DP23 states applications for development affecting designated/non-designated heritage assets are to be determined in line with more detailed supplementary planning guidance (SPG) where applicable (appears this is yet to be prepared). However, applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions made on applications can only be made in accordance with relevant policies of then development plan that have gone through the scrutiny of public examination, with supplementary planning guidance being a material consideration. This part of the draft Policy is vague and imprecise, and it is not clear how the SPG will differ from the NPPF. There is no justification for the SPG to depart from the NPPF and it should therefore be removed.
A0608	B020	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP27	Not Specified	No	Not Specified	Part 3 of draft Policy DP27 requires residential developments to deliver gigabit-capable broadband infrastructure using 'fibre to the premises' technology wherever practical. Capacity to deliver gigabit-capable broadband is determinate upon broadband providers and cannot be guaranteed by developers. Furthermore Building Regulations require in-building infrastructure for copper or fibre-optic cables or wireless devices capable of delivering broadband speeds greater than 30 Mbps to be installed. Broadband infrastructure is already covered by Building Regulations and the requirement of this policy that is well above 30 Mbps, so not justified. This policy should be amended to require broadband installation without being more specific about the type of broadband required to be provided.
A0609	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	Not Specified	Yes	Not Specified	Fully support the overarching vision set out in draft Policy SP1. The draft Policy recognises development will need to contribute to meeting local needs and make settlements more sustainable with the right mix of housing, employment, and other types of development. Consider this policy to be consistent with national policy, justified and effective and therefore sound.
A0609	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	Support overarching vision and proposals to deliver 1,400 dwellings per annum, recognising the need to deliver sufficient levels of affordable housing whilst maintaining and enhancing the role of principal and key centres such as Bridgnorth. Such an approach is considered justified and accords with national policy, recognising the standard method of calculating housing need must be treated as a minimum figure.
A0609	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Not Specified	Yes	Not Specified	Support the aim of draft Policy SP3 and the transition towards a zero-carbon economy. The policy recognises the need to minimise travel and maximise the ability to make trips via sustainable modes of transport. As such, we consider this policy to be positively prepared and consistent with national policy. The policy is therefore considered to be sound.
A0609	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	Not Specified	Yes	Not Specified	Endorse the Council's commitment to taking a positive approach to sustainable development. Draft Policy SP4 accords with paragraph 11 of the NPPF and is considered to be sound.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0608	B016	Adoption of the optional standard for water efficiency of 110 litres per person per day, within draft Policy DP20, needs justified against the criteria in National Planning Policy Guidance. Expectation of a programme of water efficiency promotion and consumer education is not necessary.	The government has introduced an optional new Building Regulation standard that can be required through a Local Plan policy if it addresses a clearly evidenced need and its impact on viability has been considered. The Shropshire Water Cycle Study provides the evidence for a standard of 110 litres per day per person and this has been assessed through the Shropshire Viability Study. The Council considers that it is reasonable to expect major development to contribute to raising awareness of the need to use water wisely. No change proposed.	No
A0608	B017	Para 2a of draft Policy DP21 should be tweaked to read: "a. Development on land allocated in this plan, unless the use of the site is not in accordance with the use specified in this Plan and falls within Flood Zones 2 and/or 3."	Noted. An appropriate minor modification is proposed to para 2a of draft Policy DP21.	Yes
A0608	B018	Draft Policy DP22 should be amended to provide an evidence base and reference specific guidance.	The Council considers it appropriate to reference LLFA guidance rather than a specific part of it a document as this allows updates to the guidance to be made during the lifetime of the Local Plan which keep it current.	No
A0608	B019	Draft Policy DP23 should comprise only paras 2 and 3. Reference to Supplementary Planning Guidance should be deleted.	The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that as such, this proposed amendment is not necessary. No change proposed.	No
A0608	B020	This policy should be amended to require broadband installation without being more specific about the type of broadband required to be provided.	Shropshire Council is working to improve broadband connectivity across the County through its Connecting Shropshire programme to attract commercial superfast broadband infrastructure investment and to bring faster broadband to areas where it is not economically viable for commercial operators to provide these services. The purpose of these objectives for connecting Shropshire to the best electronic communications infrastructure into their business premises and homes is to ensure businesses, employees and residents can embrace and optimise the use of broadband in their everyday lives. Unless the development market also embraces these objectives in their development design schemes and build specifications through the provision of network infrastructure and fibre to premises technologies then the roll out of digital connectivity will not be achieved and Shropshire will struggle in its programme to move towards and achieve the broader objective of creating a zero carbon economy in the County.	No
A0609	B001	N/A	Noted.	No
A0609	B002	N/A	Noted.	No
A0609	B003	N/A	Noted.	No
A0609	B004	N/A	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0609	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Not Specified	No	Not Specified	Support the aims and objectives of draft Policy SP5 and the delivery of new high quality developments to ensure the creation of better places to live and work. However with regard to para 2 of draft Policy SP5 consider it more effective and justified for developments to comply with specific design guidance with relates to Shropshire in particular, as opposed to the West Midlands Design Charter, which has been produced for the whole County. A Shropshire specific design charter would ensure design principles are grounded in an understanding of the County's defining characteristics but also reflects nuances and particulars in Shropshire which are not relevant to all the West Midlands. Recommend draft Policy SP5 is amended to remove reference to the West Midlands Design Charter. Should the Council feel it is necessary, a specific Design Guide for Shropshire could be prepared or such matters could also be dealt with through any site specific SPD's produced for planned strategic developments such as Tasley Garden Village.
A0609	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Not Specified	No	Not Specified	Support the need for new development to ensure the health and well-being of individuals, communities and place. However, concerned about reference to the Council's Air Quality Action Plans in Part 8 of draft Policy SP6 as whilst an Air Quality Annual Status Report was published in December 2020, no Action Plans have yet been prepared. A draft Air Quality Action Plan for Bridgnorth was published in March 2008, however this is almost 13 years old and question how relevant this remains. For draft Policy SP6 to be considered sound a timeline as to when Action Plans will be prepared should be provided, with this being published in line with, or prior to the adoption of the Local Plan Review.
A0609	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	No	Not Specified	11.4 hectares of land (STC002 and P58a) adjacent to Stanmore Industrial Estate is proposed to be released from the Green Belt in Bridgnorth for employment development. Concerned very special circumstances do not exist to support these draft allocations. Para 137 of the National Planning Policy Framework (NPPF), indicates Green Belt boundaries should only be altered when all other reasonable options have been explored and there are no other reasonable alternatives. This is not the case in Bridgnorth and therefore the policy is not considered to be consistent with national policy. The draft Shropshire Local Plan proposes to allocate Tasley Garden Village (BRD030) as a sustainable location for housing and employment delivery at Bridgnorth. This site is located in open countryside, in close proximity to existing services and facilities and adjacent to existing housing and employment SAMDev allocations. It is considered unconstrained and suitable to deliver future housing and employment needs for Bridgnorth (within the proposed Plan period and beyond). As such, there is no need to allocate Green Belt land for development within the proposed Plan period or beyond. Draft Policy SP11 is therefore not considered consistent with national policy or justified and as such is unsound.
A0609	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Not Specified	Yes	Not Specified	Fully support the aims and objectives of draft Policy SP12 and the importance of a clear vision and strategy to encourage economic growth. Welcome the additional text in Part 2 of draft Policy SP12, which notes the spatial strategy will take into account special considerations in the Green Belt, Areas of Outstanding Natural Beauty and the need to protect and improve areas of higher landscape value and the natural and historic environment. This approach is considered justified and accords with national policy. Bridgnorth is well located to deliver and support a significant proportion of economic growth, particularly around the proposed Tasley Garden Village (BRD030). Support recognition within draft Policy SP12 that there is a need to deliver housing of the right type and in the right locations to support economic growth and employment development.
A0609	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	Not Specified	Yes	Not Specified	Support the level of employment development planned to be delivered within Shropshire, which recognises its economic potential and reflects the Council's clear growth aspirations. The level of growth is, in part, justified through the Shropshire Employment Land Review, which recognises the role that Bridgnorth can play and supports Bridgnorth fulfilling its roles as the second Principal Centre in the County. Whilst the Employment Land Review did not specifically consider Tasley Garden Village (BRD030), as it pre-dates the site promotion, the Employment Land Review clearly recognises the potential of land in this location to deliver employment development as it indicates existing SAMDev allocations in the vicinity represent a real opportunity given their siting adjacent to the road and the key gateway junction on the A458 which is an obvious location to accommodate new employment development and that they represent a strategic location which would be attractive to the local market given its visibility to the highway and edge of town location with good accessibility. The Employment Land Review also recognises that these existing SAMDev allocations could open up the other adjacent plots as part of a long term vision as an employment corridor. As such consider the proposed approach to be justified.
A0609	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Not Specified	Yes	Not Specified	Support identification of the 'Eastern Belt' Strategic Corridor which includes the A458 and Bridgnorth. Such an approach is justified as set out in relation to draft Policy SP14.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0609	B005	Remove reference to the West Midlands Design Charter within draft Policy SP5. If necessary, a specific Design Guide for Shropshire could be prepared. Alternatively this could be dealt with through site-specific SPD's.	Noted. Shropshire Council have endorsed the West Midlands Combined Authority (WMCA) Design Charter and acknowledged that this can be taken into account as a material consideration to inform planning decisions and to inform policy development, notably the review of the Local Plan. It is considered the principles established within this Design Charter are appropriate in a Shropshire context. This aspect of draft Policy DP5 is complemented by the remainder of draft Policy DP5, the other draft Policies within the draft Shropshire Local Plan and the NPPF. Furthermore, the draft Shropshire Local Plan also, where appropriate, specifies that for large development sites such mechanisms as Supplementary Planning Documents (SPD's) will be used to identify more detailed and location/site specific design considerations.	No
A0609	B006	Remove reference to Air Quality Action Plans or provide a timeline of when Action Plans will be prepared (in line with, or prior to the adoption of the Local Plan Review).	The Council is satisfied that relevant and appropriate Air Quality Action Plans will be produced during the lifetime of the Plan. No change proposed.	No
A0609	B007	Remove proposed allocation STC002 and P58a.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0609	B008	N/A	Noted.	No
A0609	B009	N/A	The economic strategy in the draft Shropshire Local Plan seeks to balance new economic development and employment generation with the delivery of new housing, focused within the strategic and principal urban centres of Shrewsbury, the Market Towns and Key Centres of the County. This balance between the two principal aims of the draft Local Plan seeks to ensure that key economic objectives of the strategic approach in Policy SP2 will be met: providing for the delivery of a growing and diverse labour force; and in turn, supporting the delivery of an improving rate of economic growth and an increase in the productivity of the local economy. This balancing approach in the spatial strategy for new economic development and employment generation targets new economic development opportunities principally into Shrewsbury and the principal centres with an increase in provision in the east of the County. This will improve the economic potential of the County particularly within significant commuting locations with higher concentrations of resident labour and with higher levels of skills and academic attainment. This increased urban focus in the economic strategy of the draft Local Plan also seeks to capture the greater opportunity in urban markets to achieve more efficient development of employment land. This is expected to deliver higher proportions of developed floorspace and employment from the land that is developed in the County. This urban focused strategy will also locate a greater proportion of the new employment development into those urban centres located along the strategic corridors through the County, helping to improve the accessibility and sustainability of Shropshire's key employment locations over the plan period to 2038. This is expected to assist in retaining more of the County's resident labour force and helping to improve the productivity of the Shropshire economy. The increased concentration of new economic development and employment generation in the centre and east of the County will also enable Shropshire to increase its profile and investment offer beyond the County boundary. This will be achieved by providing a broader range and choice of both housing and economic development opportunities that are accessible to other key economic and employment markets. This will include locations in the sub-regional area, in need of additional support to meet their own economic needs and demands, which will further help to improve the economic growth potential of the County.	No
A0609	B010	N/A	Shropshire Council welcomes the support for Policy SP14 as part of the employment development strategy for Shropshire which is considered to be appropriate, effective, sustainable and deliverable.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0609	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	No	Not Specified	Support the aims of draft Policy DP1 and the need to provide a mix of homes that meet local needs. However, to ensure draft Policy DP1 is positively prepared, effective and justified, Part 1 needs to offer more flexibility to account for the changing requirements in housing needs over the proposed Plan period. Agree size, type and tenure of new dwellings should have regard to Shropshire Council's Strategic Housing Market Assessment (SHMA), however this should only apply where the SHMA is up-to-date reflects the needs of the County and individual settlements. Also consider draft Policy DP1 should be amended to account for localised and site specific evidence to support a departure from the district wide requirements set out in the SHMA. Flexibility within this policy is of utmost importance to ensure delivery of housing is not frustrated as a result of an overly prescriptive policy, or a policy which does not reflect the specific needs of the distinct settlements within Shropshire. Welcome clarification in Part 2 of draft Policy DP2 as to when a Local Housing Need Survey would be applicable and that it should have occurred within the last 5 years. This is considered appropriate and effective in ensuring proposed development meets locally identified needs. With regards to Part 2b of draft Policy DP2, acknowledge Part 2 of the SHMA has been published (September 2020) which it is assumed to be the evidence that informs the requirements of part 2b. However, this is liable to change as subsequent SHMA's are prepared and published and therefore it is recommended for the policy to be effective and justified, this is amended to make reference to an up-to-date SHMA (or equivalent survey endorsed by Shropshire Council). A failure to do this could mean that the policy requirements become outdated through the lifetime of the Plan.
A0609	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Not Specified	No	Not Specified	Generally supportive of draft Policy DP2 and the provision of self-build and custom-build housing. However, consider the requirement for all sites over 10 dwellings to provide 10% of dwellings as serviced self-build/custom-build plots is inappropriate and unjustified. This provision does not reflect current need; or evidence from the Council's Self-Build Register, which shows applications are reducing (62 for October 2018-2019, 127 and 136 in the previous two years and just 36 in the most recent period, although this may be impacted by the Covid-19 pandemic). All proposed Local Plan allocations and SAMDev allocations (without planning permission) appear to be subject to this proposed requirement, which would generate around 1,250 plots (average 57 per annum). Whilst this is less than the identified average annual number that will register on the Self-Build Register (107 per annum), the SHMA demonstrates the average annual supply without this policy is some 144 self-build properties. Combined these two sources would result in 201 plots per annum, almost double identified annual need. Clearly this evidence suggests this current requirement is a significant over estimation of the demand and requirement for self-build plots. This requirement is a particular issue for larger sites such as Tasley Garden Village (BRD030), with the development expected to deliver a full years' worth of supply for the whole County on a single site. Whilst the suggested 10% could be deemed an appropriate amount for smaller sites, to ensure the draft policy does not result a supply that far exceeds demand, recommend a cap on provision is applied. This cap should be informed by detailed assessment of expected supply, building upon the work prepared as part of the SHMA. In Part 2d of draft Policy DP2, welcome change to the length of time for marketing plots, however still consider 'at least 24 months' to be overly restrictive and would hamper wider delivery. To ensure the draft Policy is effective in ensuring continued delivery, would suggest the marketing period is reduced to 12 months. This is particularly relevant on larger sites, noting that these will continue to deliver new homes, and therefore new self-build plots, over the entire plan period, which could easily result in new self-build plots being ready to be marketed before the sale of existing plots, or the end of their mandatory marketing period.
A0609	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	Yes	Not Specified	Fully support this policy and the need to deliver affordable housing. Draft Policy DP3 is considered sound as we find it to be consistent with national policy, positively prepared and justified.
A0609	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP9	Not Specified	No	Not Specified	Generally supportive of draft Policy DP9, however to ensure the draft policy is effective and consistent with national policy, the retail hierarchy should include any planned local centres at proposed strategic sites, including that proposed at Tasley Garden Village (BRD030). This would provide appropriate policy support for the uses and protection from future out-of-centre proposals which would affect the viability and deliverability of planned local centres. By including the planned centres within the retail hierarchy, it would ensure this draft policy is positively prepared and effective and therefore it would be considered to be sound.
A0609	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	No	Not Specified	Support draft Policy DP11 overall and the need to minimise carbon emissions. However, whilst Part 1d contains some flexibility within the text, stating 'strongly encouraging', would highlight that it may not be possible on all sites of 50 dwellings plus to achieve zero net-carbon. The draft Shropshire Local Plan runs until 2038, 12 years before 2050, the data Government is seeking to achieve zero-net carbon emissions. Over time, technology will advance meaning achieving net zero-carbon emissions will be more achievable. To make this policy justified and effective, recommend a subtle change to the wording to 'encourage'. This will ensure zero net-carbon emissions are achieved where possible, but will also not render some developments unviable or not possible due to being unable to achieve zero net-gain. Throughout the proposed Plan period, we agree there should be a marked shift to providing zero net-carbon developments, but enforcements now, when technology is still catching up, could halt development. In Part 2 of draft Policy DP11 consider the BREEAM Excellent or equivalent rating to be too high a bar for developments to achieve. The Local Plan Review Viability Assessment noted the 5.5% increased costs associated with the delivery of a BREEAM Excellent standard. However it is unclear whether these were actually built into the assessment, which in any case highlighted concerns regarding the viability of employment developments. As such, the requirement to achieved BREEAM Excellent could cause viability concerns for some forms of non-residential development. As such, to ensure draft Policy DP11 is justified and effective, request wording is amended to require non-residential developments to be delivered to a minimum BREEAM 'very good' standard. This will allow some developments to be delivered to a BREEAM 'excellent' standard if it is viable however there is the flexibility to deliver the development to a 'very good' standard.
A0609	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Not Specified	Yes	Not Specified	Fully support draft Policy DP12, which seeks to avoid harm to Shropshire's natural assets and ensure that the assets are conserved, enhanced and restored. The draft Policy is consistent with national policy, in particular with the requirement to deliver 10% biodiversity net gain and the protection of natural assets. As such, this policy is considered to be sound.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0609	B011	Part 1 of draft Policy DP1 should be updated to state 'in accordance with an up to date SHMA' and to 'account for localised and site specific evidence to support a departure from the district wide requirements', to ensure that it remains effective in addressing local housing needs. Par 2b of draft Policy DP1 should be updated to reference an up to date SHMA.	Noted. Shropshire Council considers that the Strategic Housing Market Assessment (SHMA) (2020) is a robust and proportionate evidence base for informing policies on housing need. It is also considered that draft Policy DP1 provides an appropriate level of flexibility whilst also providing certainty to decision makers, communities and the development industry. Specifically with regard to para's 2a/b of draft Policy DP1, they provide an appropriate balance between ensuring that new development will include an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) about housing mix requirements, and also allowing flexibility for innovation within development. Specifically flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50% to include a suitable mix and variety of dwelling sizes. This mix can respond to such factors as site specific characteristics, local need and market demand. The mix defined for 50% of open market dwellings in para 2b is informed by the SHMA which indicates that a significant proportion of the new dwellings required during the proposed Plan period will be 1, 2 and 3 bedrooms in size. Specifically, the SHMA indicates around 32.7% of the dwellings needed will be 1 or 2 bedrooms in size and a further 43.5% will be 3 bedrooms in size. This demand for 1, 2 and 3 bedroom dwellings also reflects the view often expressed by local communities when discussing their local housing needs.	No
A0609	B012	Requirement for 10% of plots to be self-build/custom-build on sites of 10 or more dwellings should be removed. Alternatively an appropriate cap could be identified for larger sites. The 24 month marketing period for self-build/custom-build plots provided under this draft Policy should be reduced to 12 months.	Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above the specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position. It is also considered that this draft Policy provides appropriate flexibility to respond to the differing circumstances of specific sites and communities. The 24 month marketing timescales proposed within the draft Policy are considered appropriate and balance the need to provide an appropriate opportunity for potential self-builders/custom-builders to secure the plot, whilst also recognising the relationship to the wider development of the site.	No
A0609	B013	N/A	Noted.	No
A0609	B014	Include planned local centres at proposed strategic sites within the retail hierarchy.	If the Local Centres are under 300sqm then no RIA will be required. Locally the issue of protecting Town Centres is important and the current approach is consistent with how the Retail Hierarchy has been applied to Local Centres as part of SUEs	No
A0609	B015	Para 1d of draft Policy DP11 should be amended from 'strongly encourage' to 'encourage'. Para 2 of draft Policy DP11 should be amended to achieving a minimum of BREEAM Very Good or equivalent standard.	The Council considers that this policy introduces effective and appropriate policy requirements for new development to contribute to reducing impact on climate change, whilst also ensuring compliance with national policy and legislation and ensuring the continued viability of development.	No
A0609	B016	N/A	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0609	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP14	Not Specified	No	Not Specified	Support the aims of draft Policy DP14 to provide better green infrastructure within Shropshire and to enforce all new developments to make a reasonable contribution to green infrastructure wherever possible. Part 1a refers to the need to provide a Green Infrastructure Assessment in support of development proposals. Whilst supportive of the provision of green infrastructure within new developments, would welcome clarity and further details as to what would be required as part of a Green Infrastructure Assessment. To ensure that the policy is effective, and ensures applicants provide suitable Green Infrastructure Assessments as part of development proposals, further guidance should be provided on when these assessments would be required and what they would need to contain.
A0609	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP15	Not Specified	No	Not Specified	Note the additional text within draft Policy DP15 which protects existing open space. Fully support Part 2 of draft Policy DP15 regarding the need to protect public open space, whilst recognising there are some circumstances where development of it would be considered acceptable. Consider this part of the draft Policy to be justified and positively prepared. Part 6 of draft Policy DP15 refers to the need for new housing developments to provide functional areas of play and recreation. Although we do not disagree that areas of play are required for new housing developments, the draft Policy should acknowledge the specific open space needs for each settlement. At present, the policy is considered to be ineffective as it does not acknowledge that each settlement has specific open space needs, nor does it require new developments to provide the specific open space requirements for each settlement. Appendix D of the Open Space Recreation Needs Assessment and Appendix C of the Green Infrastructure Strategy Document provide a settlement breakdown of current open space provision and recommendations for future provision. To ensure draft Policy DP15 is effective in addressing the open space requirements of each distinct settlement, suggest Part 6 is amended to state that new developments should consider the findings within the most up to date open space assessment and engage with the local planning authority when determining provision. This would make the draft Policy positively prepared, effective and justified and therefore could be considered sound. Part 7 of draft Policy DP15, refers to the outcomes of the Shropshire Playing Pitch and Open Space Strategy (PPOSS). This document was published in October 2020, providing guidance to understand and assess the need for playing pitches. Have no specific comments to make on the findings of the PPOSS and support the needs to provide playing pitches and open space, in line with this strategy. Part 6 is considered to be positively prepared and justified and therefore sound.
A0609	B019	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP16	Not Specified	Yes	Not Specified	Supportive draft Policy DP16 which seeks to create and maintain attractive and well-designed environments. Endorse the provision of landscaping within new developments. Draft Policy SP16 lists a number of criteria that landscape schemes should meet, the criteria provided within Part 3 is akin to paragraph 127c of the National Planning Policy Framework (NPPF). Policy DP16 is considered to be consistent with national policy, positively prepared and therefore is considered to be sound.
A0609	B020	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17	Not Specified	Yes	Not Specified	Fully support draft Policy DP17. It recognises the need to respect, safeguard and wherever possible, restore or enhance landscape character and visual amenity in Shropshire. Have no concerns regarding the soundness of this draft Policy.
A0609	B021	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18	Not Specified	Yes	Not Specified	Supportive draft Policy DP18 which seeks to safeguard environmental quality and public amenity, minimise pollution, mitigate adverse effects and maximise opportunities for improvements where practicable. The criteria listed therein are considered to generally reflect the aims of the National Planning Policy Framework (NPPF) to prevent development from contributing to, or being put at risk from, unacceptable levels of soil, air, light or noise pollution or land instability. Have no concerns regarding the soundness of this draft Policy.
A0609	B022	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP19	Not Specified	Yes	Not Specified	Draft policy DP19 seeks to ensure development does not adversely affect the quality, quantity of flow of both of ground and surface water and ensure that there is adequate water infrastructure in place to meet the development's demand. Have no concerns regarding the soundness of this policy.
A0609	B023	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23	Not Specified	Yes	Not Specified	Fully agree with draft Policy DP23 and the recognition that Shropshire's heritage assets should be protected, conserved, sympathetically enhanced and restored. Draft Policy DP23 recognises that the likely loss, or harm to, the significance of a designated heritage asset should be determined in line with the National Planning Policy Framework (NPPF). Have no concerns regarding the soundness of this policy.
A0609	B024	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP25	Not Specified	Yes	Not Specified	Fully support draft Policy DP25 and its acknowledged that development should only occur where existing capacity allows or any shortfall can be addressed through reasonable conditions. Have no concerns regarding the soundness of this policy.
A0609	B025	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP28	Not Specified	Yes	Not Specified	Draft Policy DP28 seeks to improve transport networks, improve connectivity and accessibility, reduce car dependency and manage the impacts of transport movements. Agree this can be achieved through the delivery of a sustainable pattern of growth and development within the County which is endorsed within Chapter 9 of the National Planning Policy Framework (NPPF). Have no concerns regarding the soundness of this policy.
A0609	B026	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP29	Not Specified	No	Not Specified	Part 1 of draft Policy DP29 confirms applications for non-mineral development within a Mineral Safeguarding Area (MSA) which could have the effect of sterilising mineral resources will not be granted unless at least one of the three named criteria is relevant. Criterion c. confirms an exemption policy will apply in accordance with the rest of the draft Policy wording. Having reviewed the rest of the policy, none of the identified exemptions takes into account proposals on sites allocated to deliver development. This is considered to be unsound as it clearly creates a conflict between policies. For a site to be allocated, the Council must have fully taken into consideration all aspects of the development and its suitability for development, including Mineral Safeguarding. As such, allocated sites within the development plan should be included as an exemption to this draft Policy. For this policy to be considered sound, allocated sites should be included within the exemption list at paragraph 4.264 of the Local Plan Review.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0609	B017	Provide further guidance on when Green Infrastructure Assessments are required and what they would need to contain.	The Council considers that the policy and explanation provide an appropriate level of detail. No change proposed.	No
A0609	B018	Part 6 of draft Policy DP15 should be amended to state require new development to consider the findings within the most up to date open space assessment and engage with the local planning authority when determining provision of functional areas of play and recreation.	The Council does not consider the proposed amendment is necessary.	No
A0609	B019	N/A	Support welcomed.	No
A0609	B020	N/A	Noted.	No
A0609	B021	N/A	Noted.	No
A0609	B022	N/A	Noted.	No
A0609	B023	N/A	Noted.	No
A0609	B024	N/A	Support noted.	No
A0609	B025	N/A	Shropshire Council welcomes the support for Policy DP28 Communications and Transport.	No
A0609	B026	Include allocated sites within the list of exempted development in para 4.264 of the Explanation to draft Policy DP29.	Noted. Paragraph 4.264 of the Explanation of draft Policy DP29 states 4. Non-mineral development which is exempt from the requirements of this Policy comprises:..."Applications that are in accordance with the development plan and site allocations where the assessment of site options took account of potential mineral sterilisation and determined that prior extraction was not required". The assessment process for all proposed saved SAMDev Plan allocations and all proposed allocations within the draft Shropshire Local Plan took account of potential mineral sterilisation and determined that prior extraction was not required (unless otherwise specified). As such they are included within the specified list of exemptions (unless otherwise specified). As such it is considered that draft Policy DP29 is consistent with the wider proposed Policies of the draft Shropshire Local Plan.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0609	B027	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP31	Not Specified	Yes	Not Specified	Supportive draft Policy DP31 which seeks to protect the local community and the natural/historic environment from any adverse impacts arising from mineral developments. Support sustainable mineral workings, however highlight the importance of controlling these sites to ensure they would not be to the detriment of the closest residential receptors or the natural/historical environment. Would also highlight importance of Part 2 of draft Policy DP31, which ensures land is restored following the working of the site to an agreed state which is capable of beneficial use. In light of this, consider draft Policy DP31 to be effective and positively prepared and therefore is considered to be sound.
A0609	B028	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Bridgnorth	Not Specified	No	Not Specified	Fully support the proposed level of housing growth attributed to Bridgnorth, which will help address the affordability issues within the town and will help to boost economic growth. This part of draft Policy S3.1 is considered sound. With regard to the level of employment land proposed, we have previously raised concerns about evidence to demonstrate how this had been calculated. Acknowledge the Council now have an Economic Development Needs Assessment (EDNA). The EDNA identifies a need for between 162ha and 264ha of gross employment land between 2016 and 2038 (allowing for the 30ha contribution to cross-boundary employment needs arising in the Black Country). This is compared with the planned 300ha of employment land proposed to be delivered through the Local Plan Review. Do not object to the identification of a figure for the whole of Shropshire above the identified need, noting the need for some flexibility and the economic growth opportunities that exist. However, do have concerns regarding the proposed Green Belt release at Stanmore and the impact this could have on the deliverability of other sites within Bridgnorth. Fully support and endorse Part 3 of draft Policy S3.1 which confirms a mixed use sustainable urban extension at Tasley will contribute to the residential and employment needs of Bridgnorth. Consider identification of Tasley as the main location to support the residential and employment development requirements for Bridgnorth to be an appropriate strategy and is supported by a robust and very detailed evidence base. As noted within para 72 of the National Planning Policy Framework (NPPF), the supply of large numbers of new homes can be best achieved through the planning for larger scale development such as new settlements or significant extensions. With regard to Part 7 of draft Policy S3.1, consider the planned local centre should be designated as a centre within the retail hierarchy of draft Policy DP9, to assist its delivery and protect it from the impact of any out of centre developments. The local centre will be a central point for the new development and will serve the needs of local people. As per Chapter 7 of the NPPF and in particular para 85, planning policies should define a network and hierarchy of centres and promote their long term vitality and viability. Part 8 of draft Policy S3.1 deals with the area identified as a 'Potential Direction of Growth'. Support identification of this broad area for potential future growth and consider it necessary in order to demonstrate that the Green Belt boundary, to the east of Bridgnorth, would endure well beyond the proposed Plan period. Suggest some alterations to the wording of this part of the draft Policy to allow for some flexibility in the delivery of the Tasley Garden Village site (BRD030) to allow (where necessary) for infrastructure and open space to be provided within this area and to take into account any necessary minor amendments to the boundary of BRD030 as the Masterplan evolves through preparation of the Supplementary Planning Document (SPD). This will ensure the proposed planning and design of BRD030 is not artificially hampered by the proposed site boundary and ensure the policy is effective in delivering a high quality development informed by the future SPD. This is important given that the current boundary of BRD030 is defined by the early masterplanning work carried out by the site promoter.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0609	B027	N/A	Noted.	No
A0609	B028	<p>Remove proposed allocations STC002 and P58a.</p> <p>The proposed local centre within the proposed urban extension BRD030 should be included within the retail hierarchy as identified within draft Policy DP9.</p> <p>Para 8 of draft Policy SP3.1 should be amended to allow development within the identified Potential Future Direction of Growth where it would provide open space or infrastructure provision to support the development of BRD030 or in accordance with other policies in the plan.</p>	<p>Noted. Shropshire Council has undertaken an Economic Development Needs Assessment, Employment Land Review, Green Belt Assessment and Green Belt Review to inform the Local Plan Review. The Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Specifically with regard to employment land, this proposed strategy provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Having a supply of land which creates choice and competition in the market provides flexibility to respond to changing circumstances.</p> <p>With regard to sites STC002 and P58a, they are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page.</p> <p>With regard to the retail hierarchy, if the Local Centre at BRD030 is under 300sqm then no RIA will be required. Locally the issue of protecting Bridgnorth Town Centre is important and the current approach is consistent with how the Retail Hierarchy has been applied to Local Centres as part of Sustainable Urban Extensions within the SAMDev Plan.</p> <p>With regard to the future direction for growth, it is acknowledged that initial masterplanning indicates that the linear park referenced within the draft site guidelines for proposed allocation BRD030 extends onto this area. However it is considered that this and any other open space and infrastructure considerations would be best addressed as part of the development of the proposed Supplementary Planning Document for the site and ultimately the Planning Application processes.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0609	B029	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Bridgnorth BRD030	Not Specified	No	Not Specified	<p>Fully support proposed allocation Tasley Garden Village (BRD030) for delivery of a mixed use allocation. Consider the proposed allocation to be available, suitable and deliverable and the draft policy sound, with it being supported by a significant amount of evidence demonstrating the site's suitability for development. A vision document and masterplan demonstrating how BRD030 and the wider site promotion could be brought forward along with a suite of technical documents which further support this have been prepared by the site promoter (Appendix 1 of this representation). BRD030 would create a highly sustainable community, with new jobs, education, retail and employment opportunities on site, which will reduce the need to travel.</p> <p>Consider there is a significant need for housing development in Bridgnorth, given limited delivery over recent years, exacerbating affordability issues and demand.</p> <p>With regard to specific proposed site guidelines, they are generally considered sound, but some minor modifications are considered appropriate to make them effective and justified:</p> <ul style="list-style-type: none"> <li>-Support proposals to prepare a Supplementary Planning Document (SPD) which will detail the vision, design code and masterplan for the site. However, preparation of this SPD (which could take some time) should not be at the expense of much needed early delivery of initial phases of development, given the limited numbers of new homes delivered over recent years (primarily due to delays relating to the delivery of SAMDev allocations) which will have created pent-up demand for housing. Given the nature of the site, its relationship to the existing town and proposed access arrangements (likely to be fixed early in the masterplanning process), initial phases of development in the north-eastern corner of the site could come forward (restricted in terms of number of homes delivered and still subject to community engagement) in tandem with the SPD. Greater clarity is also required on this guideline (what is meant by completed and is it submission or determination of a Planning Application). This proposed site guideline should be amended to reflect these matters to ensure that the draft Policy is appropriate concise and effective, whilst also allowing the delivery of some initial phases in the event that the SPD is unable to be adopted very soon after the adoption of the Local Plan Review.</li> <li>-Development guidelines state at least 10% of the energy to be generated from on-site renewable and low carbon energy sources (consistent with draft Policy DP11). Welcome and support provision of renewable energy sources, however on-site renewable energy generation should be dealt with through the future SPD.</li> <li>-Endorse requirement for employment development to be an intrinsic part of the development. Additional employment land is needed to address the current balance between housing and employment and attract new businesses and industries into Bridgnorth, which will assist in securing economic growth. Agree this employment land should be located in a gateway location along the A458, which is one of the main arterial routes into Bridgnorth and, as recognised in the EDNA, is an obvious and appropriate location for growth.</li> <li>-Generally support the proposed guideline that employment uses should be targeted towards office and research and development on the basis that this would complement wider employment opportunities in Bridgnorth and contribute to the objectives of the Shropshire Economic Growth Strategy. However it is important that the type of employment delivered is not so constrained that it will prevent it from serving future and existing business needs, including the ability to adapt to changes (such as Covid-19). As such guidelines should provide flexibility to provide other employment uses that would be suitable for this location.</li> <li>-Fully support delivery of a local centre within BRD030 to deliver localised retail and community uses. Consider this local centre should be a designated centre within the retail hierarchy to ensure policy support for the development, and importantly, help to protect its future vitality and viability from any future out-of-centre proposals that may be brought forward. This amendment would ensure that the proposed local centre within the development is effective in supporting and protecting the centre.</li> <li>-Proposed development guidelines state provision of retail and community facilities will be linked to the first phase of residential development. However, consider that this would be best dealt with through the SPD. This is important as the phasing and delivery of the local retail and community facilities will largely be dependent upon its siting within the wider development site (if it is centrally located to provide greatest accessibility, it could not come forward in tandem with the first phase of housing).</li> </ul>
A0609	B029 Cont'd						<p>Development guidelines require extensive open space to be delivered on site, including new playing fields, associated facilities, green infrastructure and a new linear park. Consider BRD030 can deliver these requirements as demonstrated on the masterplan and vision document. The open space will be of a good quality and quantity to meet the needs of the community and will reflect the principles of a Garden Village.</p> <ul style="list-style-type: none"> <li>-The development guideline relating to retention of designated heritage assets is supported. However the requirement relating to non-designated historic farm buildings is not justified and imprecise (what is meant by historic and these buildings have not been individually assessed). Some existing farm buildings/sheds are historic yet are not of significance to merit retention.</li> <li>-Proposed guidelines state buffers, effective design and materials will be used to mitigate noise, dust or odour issues arising from the A458, proposed employment development and the SAMDev employment site. Fully support this approach and consider this would undoubtedly be considered in further detail through the preparation of the SPD and any future Planning Applications.</li> <li>-The proposed guideline relating to cessation of poultry units within the proposed allocation or the proposed future direction for growth is considered unnecessary and unjustified as it replicates requirements set out elsewhere, including draft Policy DP18; the location currently subject to a Planning Application for poultry units within the proposed allocation/proposed future direction for growth is some distance from much of the proposed allocation (900m from likely first phases of development, compared with 350m to nearest residences and 450m to the existing SAMDev allocations); and any impact such as noise and odour in the event the Poultry Units are constructed would be appropriately dealt with through the noise/odour assessments undertaken to inform any proposed future Planning Application for BRD030.</li> <li>-Regarding proposed guidelines relating to development being appropriately designed to accommodate pedestrians, cyclists and motorists; creating a development which promotes sustainable modes of transport is a key priority for the site promoter and the design of BRD030. Also endorse the need for BRD030 accesses to complement those associated with existing SAMDev allocations, the Council should ensure these schemes tie together.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0609	B029	<p>The proposed site guideline for proposed allocation BRD030 regarding preparation of a Supplementary Planning Document (SPD) should be amended as follows:            'The development of this site will be <b>delivered</b> in accordance with a vision, design code and masterplan which will be prepared in consultation with the public and adopted as a Supplementary Planning Document by Shropshire Council. This <b>SPD</b> will represent a significant material planning consideration and <b>should must be completed adopted before the determination of</b> any planning application for development of the site. <b>In the event an application is submitted prior to the adoption of the SPD, this will be considered against its impact on the development of a wider masterplan, vision and design code for the site.'</b></p> <p>The proposed site guideline for proposed allocation BRD030 regarding on-site renewable energy generation should be deleted and dealt with through the future SPD.</p> <p>The proposed site guideline for proposed allocation BRD030 that targets employment provision towards office and research and development should allow for sufficient flexibility to provide other employment uses that would be suitable for this location.</p> <p>The proposed local centre on BRD030 should be included within the retail hierarchy as identified within draft Policy DP9.</p> <p>The proposed site guideline for proposed allocation BRD030 regarding linking provision of retail and community facilities to the first phase of residential development should be removed and this phasing determined through the SPD.</p> <p>The proposed site guideline for proposed allocation BRD030 regarding retention of non-designated historic farm buildings should be amended as it is not justified or precise.</p> <p>The proposed site guideline for proposed allocation BRD030 regarding cessation of poultry units is considered unnecessary and unjustified and as such should be deleted.</p>	<p>Noted. Shropshire Council considers the requirement for development of BRD030 to be in accordance with a vision, design code and masterplan adopted as a Supplementary Planning Document (SPD) important, given the scale and nature of development proposed on the site. Furthermore, assumptions regarding timescales and rates of delivery for proposed allocation BRD030, and its contribution to the strategy for Bridgnorth and Shropshire, have included consideration of likely timescales for preparing and adopting such a SPD. As such the proposed guideline is considered appropriate.</p> <p>However, for clarification a minor modification is proposed to recognise that it is the positive determination, rather than submission, of a Planning Application that is linked to the adoption of the SPD. Shropshire Council, as the Planning Authority, of course cannot control when a Planning Application is submitted for any site.</p> <p>Subsection 1 (a) of the 2008 Planning and Energy Act states that Local Authorities may include policies imposing reasonable requirements for 'a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development' provided these are consistent with national policy. National policy is the 2015 Written Ministerial Statement which allows Local Planning Authorities to set Code for Sustainable Homes level 4 energy standards. Shropshire Council considers the proposed site guideline for on-site renewable and low-carbon energy generation to be consistent with the proposed requirement in draft Policy DP11, and for this draft policy to be reasonable. This requirement in draft Policy DP11 has been subject to due consideration within the Viability Assessment undertaken to inform the draft Shropshire Local Plan.</p> <p>The proposed site guideline relating to the types of employment uses targeted on the proposed employment land within proposed allocation BRD030 is considered appropriate, in that it recognises that office and research and development uses would complement wider employment opportunities in Bridgnorth and contribute to the objectives of the Shropshire Economic Growth Strategy. The guidelines are also considered sufficiently flexible to, where appropriate, allow for other suitable employment uses, where they conform with wider draft Policies including SP12.</p> <p>The proposed site guideline regarding linking provision of retail and community facilities to the first phase of residential development is considered appropriate as it recognises the importance of providing services and facilities early within a development of this scale. It is considered that the SPD can be used to determine the most appropriate means of achieving this proposed requirement.</p> <p>It is considered appropriate, consistent with the conclusions of the site assessment process and consistent with wider draft Policies in the draft Shropshire Local Plan to include a proposed site guideline relating to retention of non-designated heritage assets on the site. Those buildings which do and do not constitute non-designated heritage assets on the site will be determined during any future Planning Application process, informed by appropriate technical assessments and comments from relevant statutory consultees. However, for clarity a minor modification is proposed to amend reference from non-designated historic farm buildings to non-designated heritage asset.</p> <p>The proposed site guideline regarding cessation of poultry units operating on the proposed allocation or associated potential future direction of growth before occupation of the first dwelling is considered necessary and justified as it provides certainty that this matter is of relevance to this site and importantly the specific phasing of development of BRD030 is unknown, to be established through the SPD.</p>	Yes
A0609	B029 Cont'd			

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0609	B030	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Bridgnorth BRD030	Not Specified	Not Specified	Not Specified	<p>Commentary on the Council's evidence base document summarising the assessment of Garden Village proposals in Bridgnorth:</p> <p>-BRD030 is located outside the Green Belt and has been fully considered within the site assessment process and identified as a sustainable, deliverable and suitable option to meet Bridgnorth's needs. An alternative site proposal at Stanmore Garden Village (BRD032) is located within the Green Belt. Chapter 13 of the National Planning Policy Framework (NPPF) is clear on the purpose and importance of Green Belt. Para 136 and 137 of the NPPF indicates Green Belt boundaries should be only be altered where exceptional circumstances are fully evidenced and justified through Local Plans and before concluding exceptional circumstances exist, all other reasonable options for meeting identified needs for development should be fully examined. Concerned the Green Belt Assessment and Review undertaken to inform the draft Shropshire Local Plan underestimates the contribution that the sites around Stanmore make to Green Belt purposes (see Appendix 2 of the representation).</p> <p>-BRD030 is consistent with the NPPF with regard to transport. It benefits from direct access onto an A road (the draft Masterplan and highways work undertaken demonstrates three access points, 2 onto the A458). Highway work undertaken for the site indicates the local highway network is capable of accommodating the level of traffic associated with -BRD030 and queuing/delays can be further mitigated, if required, by minor and deliverable improvements.</p> <p>-Consider BRD030 to be a sustainable location with good access to services and facilities and the town centre. Work undertaken by the site promoter demonstrates a pedestrian footbridge is achievable within public highway over the A458, linking BRD030 to Bridgnorth. BRD030 would include high quality pedestrian and cycle connections to and through the site and safe and suitable access for all. Conversely, consider the alternative site BRD032 to be inaccessible from existing health/education provision and the town centre as existing routes are longer and not appropriate or reasonable due to narrow footpaths and gradients and proposals for links through the ancient woodland on the Hermitage are contract to the NPPF (para 175c) - no exceptional circumstances have been demonstrated or suitable compensation strategy proposed. This would place greater reliance on private car use for access to day to day facilities, including education. Agree BRD030 provides greater opportunities to make localised improvements to the surrounding network to ensure development is integrated into the existing built up area of Bridgnorth than BRD032.</p> <p>-BRD030 has been informed by a heritage assessment, which confirms less than substantial harm, at the lower end of the spectrum to two Grade II Listed Buildings and Historic England have not objected to the proposal. Conversely, Historic England consider BRD032 would result in substantial harm to a Scheduled Monument (SM). Agree with Historic England (further information provided in Appendix 3 of this representation). Historic England are the statutory advisor on the historic environment and their views given substantial weight. The NPPF also indicates SM's should be considered as designated heritage assets of the highest significance. Endorse conclusion that BRD030 represents the less risk to heritage assets than BRD032.</p> <p>-BRD030 is supported by a Preliminary Ecological Assessment which confirms the site does not contain any statutory natural environmental designations. The site is in 2 SSSI impact risk zones, but the report confirms this can be managed through design, layout and construction of development. Conversely BRD032 lies immediately adjacent to ancient woodland on Hermitage Ridge. Have significant concerns about the 15m buffer proposed by the site promoter (Government guidance suggests this is the minimum buffer and Woodland Trust guidance suggests a 50m minimum buffer, this has not been considered by the site promoter and as such is considered undeliverable whilst achieving proposed levels of development). Query how a development free buffer can be achieved when pedestrian links through the woodland are proposed. Also consider proposed pedestrian links through the ancient woodland (via a boardwalk) would undoubtedly cause deterioration of the species and habitats within this valued ancient woodland and do not consider any exceptional circumstances exist (para 175c of the NPPF). There also appears little assessment of the impact of this level of new housing close to ancient woodland, this can result in harm as a result of increased use for recreation, invasion by non-native plant species (introduced into private gardens) and impacts from an increase in domesticated pets (e.g. cats). It appears inevitable that such a development would result in the loss of deterioration of the ancient woodland. Endorse conclusion that BRD030 represents the less risk to ecology assets than BRD032.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0609	B030	N/A	Noted. In identifying proposed site allocations a proportionate and robust site assessment process has been undertaken, which included consideration of ecological issues.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0609	B030 Cont'd						<p>BRD030 is considered to be consistent with the aims and objectives of the NPPF in terms of landscape and sensitivity. Generally support conclusion BRD030 and BRD032 are broadly neutral on this matter. However, the assessment concludes BRD030 is more sensitive to employment, but would note that the site is located adjacent to the SAMDev employment allocation, which once developed will alter the current landscape and change the baseline. Additionally, although a development of this scale will be visible from several locations within the surrounding area (particularly employment aspect) the illustrative masterplan, informed by analysis of landscape and visual issues, demonstrates development can be sensitively integrated and respect and enhance the surrounding landscape. Mitigation measures are also proposed to reduce potential effects. With regard to the Landscape and Visual Sensitivity Appendix, agree the offset between BRD030 and Oldbury Conservation Area mean the sensitivity of the landscape character areas containing the site may be reduced. Also agree that occupiers of listed buildings do not have enhanced visual sensitivity and there is not extensive visibility of the site from land to the south-west. Further comments provided in Appendix 4 of this representation.</p> <p>-The masterplan for BRD030 demonstrates how the site could be developed to avoid areas of flood risk, which are associated with Tiddle Brook which runs along the western/southern boundary of the site. Also consider it likely that the current flood mapping over-estimates these areas, based on site visits and landowner knowledge. Do not disagree with the conclusions of the option assessment.</p> <p>-The assessment identifies and considers a number of public protection matters regarding BRD030 and concludes that can be easily managed and mitigated through design and layout. The illustrative masterplan demonstrates that this is the case without affecting the ability to deliver the requirements set out in draft Policy S3. Regarding poultry units, earliest phases of BRD030 are some distance from the site subject to a Planning Application for poultry units, if this is granted, this could be considered/dealt with through technical assessment and consideration against draft Policy DP18. With regard to the livestock market relocation site, note this allocation itself includes substantial landscaping.</p> <p>-BRD030 promoters fully support provision of affordable housing and propose to comply with the affordable housing requirements of draft Policy DP3. Noted promoters of BRD032 propose provision of 30% affordable housing however references to 'key worker' and 'local employment' mean it is unclear whether this all meets the definition of affordable housing and no viability assessment has been prepared for the site to demonstrate this is viable.</p> <p>-Confirm BRD030 would deliver all necessary requirements relating to energy efficiency on site.</p> <p>-Support Council's comments regarding the opportunity BRD030 presents for Bridgnorth regarding employment provision. BRD030 would build on existing employment allocations and provide a concentration of employment floorspace well related to the strategic road network and resident population. Employment offer would be difference from that at the existing Stanmore Industrial Estate which is based around engineering and advanced manufacturing. The two areas could be complementary.</p> <p>-Endorse the Council's conclusion that BRD030 is the most appropriate located to deliver a mixed-use allocation to meet the needs of Bridgnorth and its wider hinterland.</p> <p>-BRD030 is not subject to technical or environmental constraints which would prevent its delivery. It will protect the Green Belt from development and is well related to existing services and facilities within Bridgnorth (it can also significantly improve connectivity and provide on-site services and facilities to meet needs of existing and future residents).</p> <p>-Support conclusion to propose to allocate part of BRD030 for development and identify the remainder as a potential future growth area.</p>
A0609	B031	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 Bridgnorth P58a and STC002	Not Specified	No	Not Specified	<p>Proposed allocations STC002 and P58a involve release of land from the Green Belt. Concerned that the Green Belt Assessment and Review undertaken to inform the draft Shropshire Local Plan underestimates the contribution that the sites around Stanmore make to Green Belt purposes (see Appendix 2 of the representation). Chapter 13 of the National Planning Policy Framework (NPPF) is clear on the purpose and importance of Green Belt. Para 136 and 137 of the NPPF indicates Green Belt boundaries should be only be altered where exceptional circumstances are fully evidenced and justified through Local Plans and before concluding exceptional circumstances exist, all other reasonable options for meeting identified needs for development should be fully examined. As these sites are in the Green Belt there is a need to demonstrate Exceptional Circumstances.</p> <p>Having reviewed the circumstances presented by the Council we would note reference is made to evidence regarding current demand, capacity and occupancy rates at the existing Stanmore Industrial Estate, but this has not been published and does not form part of the evidence base for the draft Shropshire Local Plan. This evidence is important given the purpose of these sites is to allow for expansion of Stanmore Industrial Estate.</p> <p>Do not consider exceptional circumstances have been demonstrated and consider there is no need or justification to release Green Belt land around Stanmore to accommodate employment use. As such STC002 and P58a should be removed from the draft Shropshire Local Plan and the land retained as Green Belt.</p> <p>Concerned about the need for these employment allocations and the impact this would have on deliverability of employment land within and adjacent to Tasley Garden Village (BRD030).</p> <p>Notwithstanding the above, welcome the additional wording within proposed development guidelines for these sites, which requires the employment development to be targeted towards the engineering and advanced manufacturing sectors, to complement the employment offer on the existing Industrial Estate. This is considered effective, noting the Exceptional Circumstances presented regarding delivering a concentration and expansion of advanced manufacturing and engineering floorspace at the site.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0609	B030 Cont'd			
A0609	B031	Remove proposed allocations SCT002 and P58a from the draft Shropshire Local Plan.	<p>Noted. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Shropshire Council considers that these assessments are appropriate, proportionate and robust.</p> <p>Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire.</p> <p>The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page.</p> <p>Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0609	B032	Sustainability Appraisal	Sustainability Appraisal	Not Specified	No	Not Specified	<p>The following concerns with the Sustainability Appraisal (SA) methodology are identified:</p> <ul style="list-style-type: none"> <li>-The assessment omits SAMDev Plan allocations that are proposed to retained. As such the Council may be criticised for not being able to compare these allocations with the sites within the SA. Recognise the SAMDev Plan allocations were subject to SA at allocation, however assessment criteria and spatial context is now different. This may be a significant oversight given National Planning Practice Guidance (NPPF) requires SA to develop Local Plan options including reasonable alternatives and evaluate the likely effects of the Local Plan and alternatives.</li> <li>-The SA scoring utilised a distance of 480m as the average 10 minute walking distance (derived from the Council's Open Space, Sports &amp; Recreation Interim Planning Guidance (September 2010). This was based on Planning Policy Guidance 17 (PPG17) which has been revoked. 800m is the normal proxy for a 10 minute walking distance as established by reputable and much utilised sources. Consider use of 480m is not justified and instead 800m should be used.</li> <li>-It is unclear how measurements have been taken - walking distance or as crow flies. This should be clarified.</li> </ul> <p>With regard to Stage 2a for BRD030:</p> <ul style="list-style-type: none"> <li>-Criterion 3 relates to tree preservation orders (TPOs). It indicates a TPO is present within the site, however this is not the case (and it is not identified as a constraint in stage 3 of the site assessment). Consider this is an error.</li> <li>-Criterion 5 relates to access to services and facilities. However access to a children's playground needs to be corrected (there is one located on Wenlock Risk within approx. 385m of the site).</li> </ul> <p>With regard to Stage 2b for BRD030:</p> <ul style="list-style-type: none"> <li>-No comments.</li> </ul> <p>With regard to Stage 3 for BRD030:</p> <ul style="list-style-type: none"> <li>-Fully support the findings of Stage 3 of the assessment with regards to BRD030. The site can deliver a sustainable urban extension to address the housing and employment needs of Bridgnorth.</li> <li>-Concerned with the referenced highways accessibility score, as no clarification is provided on what this means and why some sites are and are not assessed.</li> </ul>
A0610	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP7	Not Specified	Yes	Not Specified	The cross subsidy policy is an opportunity to deliver a significant number of affordable dwellings and recognises the difficulty in getting landowners to make sites available. The proposed mix of 70% affordable to 30% open market, appears an logical mix which should be welcomed by local communities whilst ensuring the landowners receive a suitable return.
A0610	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP7	Not Specified	Yes	Not Specified	The cross subsidy policy is an opportunity to deliver a significant number of affordable dwellings and recognises the difficulty in getting landowners to make sites available. The proposed mix of 70% affordable to 30% open market, appears an logical mix which should be welcomed by local communities whilst ensuring the landowners receive a suitable return.
A0610	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP6	Not Specified	Yes	Not Specified	The proposed policy for single plot affordable dwellings has worked very well in delivery a significant number of good quality affordable housing for Shropshire. Whilst it is evident that isolated development should be avoided, the proposed policy seems overly restrictive and goes against the spirit of the original policy to afford more opportunity for affordable homes, rather than restrict. Proposed policy advises that a suitable "site is within and well related to the built form of a settlement and has permanent and substantial buildings on at least one side". It is considered that flexibility should be maintained in this policy to allow sites to be assessed against the spatial pattern of each individual settlement.
A0610	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 WHT042	Yes	Yes	Yes	The plan proposal for Whitchurch is considered sound and logical, with site WHT042 providing a logical rounding off of the settlement alongside delivering the adjacent Employment site.
A0611	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Yes	Yes	Yes	The Plan is considered sound and the accompanying evidence base is clear in how decisions and judgements were made across the board. Despite members of the community having concerns over the appraisal of the services and facilities afforded Clive, in assessment of the hierarchy of settlements, the status of Clive as a Hub is appropriate, reflective of the range of services and facilities afforded. As a Hub only a modest amount of future managed growth will be allowed, securing much needed community infrastructure, protecting the village from speculative inappropriate development via. the proposed settlement boundary.
A0612	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Longden	Not Specified	No	Not Specified	Concerned regarding proposals for Longden to be identified as a Community Hub and feel this is fundamentally unsound. Development resulting from this status would be out of keeping with the character and beyond the capacity of this small rural community. It would also result in loss of green spaces. Longden is not a community on the scale of Hanwood, Pontesbury or Bayston Hill. Development on the scale of these other communities, without the infrastructure or support for it (the school is full, the shop is small but ideal for the village etc) would eradicate its attraction and identity. Disagree with Hierarchy of Settlements as applied to Longden. The ways in the small shop, very brief visit by the library van and occasionally opening pub have been considered as being major facilities is unsound. Disagree with sites which have been included despite appeals on these sites being rejected (016 & 022).

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0609	B032	<p>Assess SAMDev Plan allocations proposed to be retained within the draft Shropshire Local Plan.</p> <p>Utilise 800m rather than 480m when assessing access via a 10 minute walk.</p> <p>Update Stage 2a of the site assessment regarding presence of a tree preservation order (TPO) on BRD030.</p> <p>Update Stage 2a of the site assessment regarding access to a children's playground for BRD030.</p> <p>Update Stage 3 of the site assessment providing an explanation regarding the purpose and scope of the highway accessibility scoring.</p>	<p>Shropshire Council is not proposing to allocate existing SAMDev Plan Allocations, rather it is saving the existing allocations. As such it is not considered necessary or appropriate for these saved sites to be included within the Sustainability Appraisal (SA) for site assessment process, unless they have been considered for alternative uses.</p> <p>The SA Scoping Report set out the proposed criteria for site evaluation. The Scoping Report was subject to consultation in the early stages of the Plan making process and amendments made as a result. As such, the Council considers the SA criteria for site evaluation to be appropriate and does not propose any change.</p> <p>Within the SA, access to services has been assessed 'as the crow flies'. Whilst there will inevitably be debate about what is considered an appropriate distance for an average 10 minute walk, the priority is ensuring a consistent assessment: this is what has been undertaken to inform the draft Shropshire Local Plan, As such the SA and site assessment process are considered appropriate, proportionate and robust.</p> <p>There is a Group Tree Preservation Order on the opposite side of Ludlow Road, south of Glen View children's nursery – this is within 30m of the site boundary. The Council's Open Space assessment does not record a children's play area within the 480m of the site boundary. No change proposed.</p> <p>Within the stage 3 site assessment, highway accessibility scoring is not provided for smaller settlements or for very large sites/groups of sites, such as BRD030</p>	No
A0610	B001	n/a	Noted.	No
A0610	B002	n/a	Noted.	No
A0610	B003	DP6 (2)b. The site is within and well related to the built form of a settlement;	Noted. Shropshire Council consider the criteria and requirements identified within draft Policy DP4 are appropriate and set out a clear approach to single plot exception sites. The Plan is intended to be read as a whole and therefore in addition to the criteria set out in draft Policy DP4 the relevant requirements of all other applicable policies will need to be taken into account in decision making on planning applications along with other material considerations. A Housing SPD will also support housing policies and provide further guidance	No
A0610	B004	n/a	Noted.	No
A0611	B001	n/a	n/a	No
A0612	B001	<p>Refers to correspondence from LVAG.</p> <p>Remove Community Hub status from Longden Village.</p>	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Longden.</p> <p>As such it is considered appropriate for Longden to be identified as a proposed Community Hub.</p> <p>However recognising the level of development that has occurred over recent years within the settlement, and its characteristics, constraints and opportunities the draft Shropshire Local Plan has identified a low residential development guideline of some 50 dwellings (equating to just over 2 dwellings per annum) for the settlement. Completions already achieved within the draft Shropshire Local Plan period from 2016-2038 and current commitments achieve around half of this proposed residential guideline. As such, it has been concluded that no specific site allocations are required to achieve the proposed residential development guideline and the remaining windfall allowance is some 27 dwellings (as at 31st March 2019). This is considered an appropriate, effective, sustainable and deliverable approach.</p> <p>In order to undertake a comprehensive site assessment process, numerous sources have been used to identify sites for consideration, including past Planning Applications. Consideration of such sites does not necessarily mean Shropshire Council endorses their development.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0613	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP9	Not Specified	No	Not Specified	Whilst the principle of the policy is supported, concerns are raised over the overly restrictive requirements for new residential development. Rural community clusters require a mixture of appropriate development including a modest amount of modest new build housing. The drafted policy, suggests that new residential development will be delivered via; "2c. On suitable small-scale infill sites of 0.1ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings"; Firstly the density of the development suggested; 3 dwellings on 0.1ha would be out of keeping with the majority of settlements proposed to be community clusters and arguably could be considered over development. Secondly, the restrictive description of what constitutes a suitable site would limit modest growth of community cluster settlements.
A0613	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.3	Yes	Yes	Yes	The Plan is considered sound and the accompanying evidence base is clear in how decisions and judgements were made across the board. As a property owner in Ash Magna, I wish to self build a modest house on a previously developed site adjoining the settlement of Ash Magna, but outside of the current development boundary.
A0614	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2	Not Specified	No	Not Specified	Given the level of services available and the surrounding countryside, as well as the proximity of additional working opportunities in Shrewsbury, it is clearly an attractive place to live. There is unmet housing need within Bayston Hill which could be fulfilled either through its designation as a Key Centre or the identification of an appropriate development guideline. The 2020 version of the SHMA does not provide statistics on the need for affordable homes at a settlement level. During years of comparatively very high housing completions, the level of affordable delivery is still well below identified need figure of 800 dwellings per annum. This provides further justification for the identification of allocations in higher market areas where affordable housing is viable and will be delivered. 200 dwellings should be the minimum figure for consideration in Bayston Hill. This scale of development will enable the provision of much needed affordable housing and market housing in an area which is attractive to developers. There are also less sustainable Community Hubs with larger development guidelines than Bayston Hill.
A0614	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 BAY039	Not Specified	No	Not Specified	BAY039's residential development guideline is too low. 115 dwellings would mean an appropriate 19.8 dwellings/ha. The lack of development in the previous plan period means that there may be limited windfall opportunities in Bayston Hill. "Approximately" 100 dwellings lacks certainty.
A0614	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	No	Not Specified	In relation to DP3 (1)(d), the policy states that where affordable housing is to be secured on site, its tenure should comprise 70% social or affordable rent accommodation and 30% intermediate or other affordable housing, unless evidence of local need indicates otherwise. However, there is no clarity provided in either the policy or the supporting text on whether "other affordable housing" includes First Homes or the other tenures included in the definition provided in the Glossary to the NPPF. The stated approach is currently not justified or consistent with national policy and therefore unsound. The approach should be amended to ensure consistency with the Government's policy changes. 2.26 In relation to DP3 (1)(e), the policy seeks to restrict affordable rents to 80% of market rent, noting that this should not exceed the Local Housing Allowance Housing Benefit. It is currently unclear whether this policy allows for annual rent increases on both social rent and affordable rent properties. It is often the case that affordable rent properties are capped on first let which prevents rents increasing in line with Government policy. Preventing such inflation can have critical impacts on Registered Providers, as rising costs would give the effect of a rent cut for these businesses. There is a significant concern that this scenario could potentially threaten the delivery of affordable housing in the borough. As currently worded the policy is not justified or consistent with national policy and therefore unsound. The approach should be amended to ensure consistency with the Government's policy on rents for social housing.
A0614	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Yes	Not Specified	Support delivery of quality family housing in sustainable locations and acknowledges the role this can play in attracting new families to the County. It is important that the future growth aspirations are aligned with housing policy and that enough of the right types of housing are built to ensure that the labour force and skills the economy needs will be attracted to and retained in Shropshire. Overall this policy is supported.
A0614	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Not Specified	Yes	Not Specified	The Council is correct to use the energy hierarchy but then they appear to circumnavigate it by jumping straight to renewable and low carbon sources. The primary aim should be to reduce energy use; it should not matter if that can be achieved through a fabric first approach. A more sophisticated approach is needed than is currently being suggested
A0614	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Not Specified	Yes	Not Specified	Support identification of development guidelines for named Community Hubs. The housing figures clearly seek to acknowledge the sustainability of Community Hubs, as well as the requirement to meet the needs of small settlements for new housing and sustain the existing services.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0613	B001	SP9 (2.c); Residential development will be delivered: “c. On suitable small-scale sites of 0.3ha or less, which are well related to the built form of the settlement, respecting the local spatial pattern and are for up to a maximum of 3 dwellings;”	Noted. It is considered that the definition of infill plots provided within draft Policy SP9 is appropriate. It provides a level of certainty to local communities and the development industry about the types of sites that are suitable for such development - in terms of location, size and capacity; ensures an effective use of land; but also allows for flexibility to density, design and layout, as the referenced site size (0.1ha or less) and capacity (maximum 3 dwellings) are maximums. As such it recognises the diverse nature of Community Clusters and the settlements within them.	No
A0613	B002	n/a	Noted.	No
A0614	B001	In order to significantly boost the supply of new homes, and avoid potentially under delivering on the identified requirements, the wording should be amended to “at least 200 dwellings”. Any provision over and above these guidelines should therefore be considered on its own merits and whether it comprises sustainable development. It is specifically the use of “around” in regard to the development guidelines for all Community Hubs with which our client disagrees and objects to. The approach as currently drafted is not positively prepared and is therefore not sound.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers that the proposed development strategy for Bayston Hill and the existing commitments, proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This strategy has been informed by consideration of the characteristics, constraints and opportunities that exist within the settlement. The retention of the Green Gap between Shrewsbury and Bayston Hill is considered an appropriate policy consideration. Proposed site allocations have been informed by a robust and proportionate site assessment process, including consideration of the landscape and policy considerations such as retention of Green Gaps between settlements. The proposed approach to managing development proposals where they exceed settlement residential development guidelines is also considered appropriate.	No
A0614	B002	Support allocation of BAY039 and have taken on board the development guidelines but believe the quantum of development (approximately 100 dwellings) is not sound and therefore the policy wording should be amended from “approximately 100 dwellings” to “at least 115 dwellings”.	Shropshire Council considers the proposed capacity of BAY039 is appropriate. It should be noted that Para 4 of Draft Policy S16.2 recognises that the Provision figures are 'approximate'. It states "Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan." Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.	No
A0614	B003	The approach should be amended to ensure consistency with Government’s policies on affordable housing and guidance on rents for social housing.	Noted. Affordable housing is defined within the National Planning Policy Framework. Shropshire Council considers that the policy approach to proposed affordable housing contributions is appropriate. It responds to the significant affordable housing need identified in Shropshire and best available information on development viability, from within the Shropshire Viability Study. Shropshire Council also considers that the proposed tenure split effectively responds to evidence on affordable housing needs, as summarised within para 4.52 of the explanation to draft Policy DP3 of the draft Shropshire Local Plan. It also provides flexibility for alternative tenure splits where local need would support this. A Housing Supplementary Planning Document will support housing policies and provide further guidance.	No
A0614	B004	n/a	Noted.	No
A0614	B005	The Council is correct to use the energy hierarchy but then they appear to circumnavigate it by jumping straight to renewable and low carbon sources. The primary aim should be to reduce energy use; it should not matter if that can be achieved through a fabric first approach. A more sophisticated approach is needed than is currently being suggested	The Council considers the approach taken in draft Policies SP3 and DP11 is appropriate.	No
A0614	B006	n/a	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0615	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Paras 16.15 to 16.53	Yes	No	No	<p>1. Cressage should remain open countryside not be designated a Community Hub to ensure no significant housing development will take place in the proposed Plan period. This would reflect the view of the majority of residents.</p> <p>2. Draft Shropshire Local Plan targets are too high, process undemocratic &amp; will not deliver sufficient affordable housing (lack of soundness on this basis also highlighted by CPRE). Identified growth not sustainable, particularly in view of climate emergency.</p> <p>3. Full needs assessment required to understand what is needed for the village</p> <p>4. Parish Council has not challenged Community Hub status or accurately represented local view - this should be considered by the Inspector.</p> <p>5. Shropshire Council has not been sufficiently resourced to properly consider consultation responses and responses have been ignored with no feedback given.</p> <p>6. Consultation not been satisfactory or appropriate during Covid 19 pandemic restrictions and Reg 19 &amp; should be re-run. Consultation specifically has not adhered to Gunning principles, particularly adequate access &amp; time for consideration and response since libraries have been closed denying access for persons without internet access.</p> <p>7. Community Hub status based on flawed scoring system is incorrect, in particular points awarded for mobile library being the same as a permanent library; points awarded for a closed place of worship and a pharmacy when there is only a dispensing surgery &amp; points awarded for public transport links provide no differentiation between levels in larger towns and Cressage.</p>
A0616	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S9.1	Not Specified	No	Not Specified	<p>“New residential development will be delivered through the development of the identified site allocation” –</p> <p>Why are alternative sites not being considered? The identified site does not fit with the character of the village as it is too large and will suffer from access issues due to the main access being located on a corner.</p>
A0616	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S9.1 para 5.124	Not Specified	No	Not Specified	<p>“5.127. It is important that development takes account of known critical infrastructure constraints and requirements, particularly highways which is a known local concern, as identified within the Implementation Plan and Highley Place Plan.” –</p> <p>The lack of capacity and access issues at the current medical centre are not mentioned in this document. The Highley Place Plan states it is “the responsibility of the local GP to submit a business case to the CCG” in order to improve the medical centre, if the local GP does not do this (and they are under no obligation) there would be a critical lack of medical infrastructure for the current population let alone an increase of 100 houses.</p>
A0617	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 SHR173	No	No	Not Specified	<p>I refer to Appendix Q: Shrewsbury Place Plan Area Assessment, December 2020, page 22. The Old River Bed SSSI, a very important nature conservation area, and wildlife corridor, is within 500m of the proposed houses ( at one point being within 50m). The area of the river bed to the west of Ellesmere Road is of a similar character and is vital to the conservation of wildlife, including the protected Bat colony to the north of Hencote. SHR173 is also tied to a road which will boost carbon emissions and increase traffic on nearby existing roads. Any benefit of the NWR will be cancelled out by the size of the proposed development</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0615	B001	Inspector to consider flawed Community Hub scoring system; whether appropriate consideration and weight given to previous consultation responses and adequacy of current consultation during the pandemic should be scrutinised at examination. CPREs response & objections should be fully considered.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate for Cressage to be identified as a proposed Community Hub.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings towards unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Cressage. As such it is considered appropriate that Cressage is identified as a proposed Community Hub and it is proposed to identify a development guideline, development boundary and to identify proposed allocations - consistent with other rural settlements considered to be appropriate Community Hubs for policy purposes. Shropshire Council also consider that this proposed development strategy for Cressage, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. The consultation process set out the new policies and proposals to be contained in the new Local Plan and explained how these changes will alter the current position in the adopted SAMDev Plan (2015). In particular that Cressage will cease to be a countryside settlement and will instead become a Community Hub. These changes are not intended to cause any confusion they simply explain the implications of the new Local Plan, these changes have been further explained by both the local Councillor and by the Parish Council. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Responses received to each stage of consultation has been given due consideration and they informed the continued development of the draft Shropshire Local Plan. It is recognised there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on any issue. Where there has been disagreement or objection to proposals within responses to each stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy and to propose an appropriate strategy to meet Shropshire development needs and to conform to the requirements of national policy.</p>	No
A0616	B001	Remove the identified site or reduce its size and include alternative, smaller sites for consideration through the usual planning process. There is no reason not to identify three or four smaller sites rather than one, sprawling large site which does not fit the character of the village.	<p>Shropshire Council considers that the proposed development strategy for Highley and the existing commitments, proposed allocation and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>	No
A0616	B002	In order to support the proposed level of development the Shropshire Local Plan must include details of how the required medical infrastructure will be provisioned and will be guaranteed to be in place before development starts. The same applies to highways infrastructure, the road out of the village towards Kinlet is unable to support the current level of traffic and will suffer more issues should 100 houses be added to the village (as witnessed by the most recent repairs lasting around 5 years before the road slips again towards the brook).	It is important to note that the draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines for HNN016 identify some of the key infrastructure requirements and identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for the site.	No
A0617	B001	I would suggest smaller developments to meet local need may be beneficial, but the size of SHR173 is too large and exceeds that of central government proposals. Furthermore it is greater in size than any option Shirehall has consulted upon, with most respondents wanting less. It needs to be redrawn taking into account the local housing demand and infrastructure, impact on wildlife, CO2 emissions, transport capacity, and amenity value.	Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations will contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The site assessment for SHR173 has considered fully a number of potential on site constraints and it is considered these can be mitigated through development. Furthermore, whilst the proposed allocation seeks to establish the principle of development on this site, the proposed development guidelines for the allocation include the need for the site promoter/applicant to prepare a masterplan to be approved by Shropshire Council in advance of a planning application, to include the consideration of, amongst other things, the site's design and layout to be informed by site constraints including the site's proximity to the Old River Bed. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0618	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Hadnall	Yes	Yes	Yes	I fully support Hadnall PC's endorsement of HDL006 as the preferred site and the adoption of Hadnall as a hub.
A0619	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	No	Not Specified	Not Specified	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan.
A0619	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	No	Not Specified	Not Specified	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.
A0619	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	No	Not Specified	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0619	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1 (STC002 and P58a)	No	Not Specified	Not Specified	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0618	B001	I would also like to see HDL008, 009 and 014 included within the development boundary.	Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement.	No
A0619	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan. Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0619	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself. Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0619	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0619	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0619	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	No	Not Specified	Not Specified	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an “additional provision to address local circumstances” of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no “local circumstance” that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.
A0620	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	HoS is flawed and unsound – ignores the requirement for a Hub to have both significant employment and peak-time public transport (Trefonen has neither). Therefore contrary to SP3 and SO5, SO6 and SO12, in the Draft Plan. HoS is subjective.
A0621	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23	Not Specified	No	Not Specified	This policy is generally supported, however, the wording of part 4) represents a departure from the NPPF. Para 197 states that ‘in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.’ By contrast, part 4) states that ‘proposals which are likely to result in loss of, or harm to, the significance of a non-designated heritage asset and/or its setting, either directly or indirectly, will only be permitted if it can be clearly demonstrated that the benefits of the proposal outweigh that loss or harm.’ There are clear and demonstrable public benefits resulting from the inclusion of SHF032. Site allocation SHF032 has been removed from the current draft Local Plan following heritage concerns raised by Historic England. In the context of the balanced judgement outlined in draft DP23 it is considered this position should be reviewed as part of the draft Local Plan consultation. It is highlighted that the Council had previously considered the site suitable for Green Belt release due to its limited harm. When balanced against the significant public benefits associated with this allocation and the robust mitigation measures put in place with regard to the heritage asset, there is a clear and demonstrable case for this allocation to be reinstated.
A0621	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP25	Not Specified	Yes	Not Specified	The location of housing on sites east of Shifnal is considered more favourable given that trips towards the M54 will route away from the town centre, and the proximity of the proposed development on SHF018b and SHF018d provides realistic opportunities for future residents and employees to travel by sustainable modes. Further, the proximity to schools, in particular Idsall School, and direct walking route to the station demonstrate additional sustainable benefits for the sites and the potential to minimise traffic movements through the town centre. As a result, inclusion of SHF032 and SHF018c, as an alternative to the south west safeguarded land, will provide greater potential to reduce level of traffic generated on the local highway network through effective behaviour change/mode shift initiatives ). In addition, it is further noted that proposed safeguarded land at 17a has now been removed to the south west of Shifnal. This will therefore not allow for delivery of a full bypass between the A462 south and west and across the railway line, as originally anticipated. The deliverable bypass based upon the extent of safeguarded land will now only be partial and is unlikely to present a significant benefit for through traffic using the A464. In addition, the inclusion of SHF018c would represent a highly sustainable extension to Shifnal with good access to existing services and facilities within the town centre, including walking distance to the train station and local schools. The option for this land to include a potential health/medical facility and/or day nursery (delivered at an earlier stage, if required) to serve existing and future residents (of adopted and proposed housing allocations) further demonstrates the benefits of this alternative option.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0619	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0620	B001	HoS needs to comply with SP1, SP3 and Sustainability Objectives SO5, SO6 and SO12. The requirements to have both 'significant employment opportunities' and 'peak time public transport' for Hub Status must be met. Trefonen should be removed from Hub status.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment. As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.	No
A0621	B001	Part 4 to more align with Paragraph NPPF 197	The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that as such, this proposed amendment is not necessary. No change proposed.	No
A0621	B002	N/A	Noted	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0621	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Policy SHF15.1 Shifnal and DP28. Communications and Transport	Not Specified	Yes	Not Specified	The land east of Shifnal, encompassing employment allocations SHF018b and SHF018d, proposed reinstated allocation SHF032 and proposed residential safeguarded land at SHF018c, have been appraised in the context of these objectives. Being located on the eastern edge of Shifnal, they are able to benefit from excellent opportunities for both future residents and employees to travel to the Town Centre on-foot or bicycle. In terms of walking and cycling routes, the sites will be developed with a focus on prioritising pedestrian activity and cycle movements. Links to wider routes will be provided by linking proposed internal pedestrian and cycle routes with existing and proposed off-site routes on Coppice Green Lane and along Stanton Road, including connection to National Cycle Route 81. The travel planning strategy for the respective sites will also seek to ensure that the long-term management of the promotion and delivery of sustainable transport initiatives will be secured and managed, both for the employment and residential uses. This transport approach to the land east of Shifnal has been developed to align with the requirements of draft Policy DP28 and is considered to similarly accord with NPPF paragraph 103. This states that 'significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.'
A0621	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 7	Not Specified	No	Not Specified	Schedule A7 of the Draft Local Plan sets out indicative timescales for the development of allocations for short-, medium- or long-term delivery timescales. SHF018b & 018d is indicated as medium- to long term, including beyond the plan period. SHF018b & 018d are readily available for delivery and development can therefore be brought forward in the plan period to the short & medium term stages. There is no reason to seek to delay delivery of the employment sites, which would meet an identified current need and can assist the growth of Shifnal and Shropshire.
A0621	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15	Not Specified	Not Specified	Not Specified	The draft policy for Shifnal is supported. The approach to safeguarded land is questioned to ensure that the land identified for Green Belt release is the most suitable available and the extent allocated is justified, to ensure the approach is sound. The allocation of the employment sites (SHF018b and SHF018d) is strongly supported and justified based on the clear need for additional employment land in Shifnal, as set out in the Council's own evidence base. Similarly, based on Shifnal's historic under delivery of housing and to support the town's economic growth, it is considered that there is a strong case to reinstate previous allocation SHF032. Para 5.212 outlines the requirement for commercial buildings to be 'developed as single storey properties that here, are expected to largely provide Class B1c, B2, and B8 uses serving the sub-regional supply chains on the A5, M54 and M6 corridors.' This requirement is considered to be overly restrictive and will constrain the ability for the strategically important employment allocations SHF018b and SHF018d to respond to market demand and requirements. In addition, allowing for floorspace to be provided across more than one storey (limited to a certain height) would help to deliver the Council's aspiration for a landscape-led campus, as opposed to large, single storey units, with a more substantial footprint.
A0621	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1	Not Specified	Yes	Not Specified	Fully support the employment allocations SHF018b and SHF018d. Modifications to the policy wording for the allocation from Regulation 18 stage are welcomed, as amended in the current draft. Notwithstanding this however, it remains to be considered that the policy wording is overly prescriptive, and the detail referred to would evolve, be fully justified and ultimately secured through a planning application. An overly prescriptive policy may unnecessarily restrict future flexibility and adaptability. The policy continues to propose the consideration of a link with the Lamledge Lane Industrial Area (Shifnal Industrial Estate). Whilst this potential can be explored as part of a future planning application, this requirement should not be a precursor for development given the opportunities for pedestrian and cycle access via Stanton Road and Upton Lane. In addition, connectivity would be reliant on a third-party and as delivery remains outside of the control of the landowner and Council, it is suggested this reference is omitted from the policy. In terms of transport considerations, the current wording is overly prescriptive and should allow for greater in-built flexibility in line with NPPF paragraph 87. Any requirement to improve Stanton Road should arise from an evidenced safety or capacity assessment as part of a planning application, and be necessary and appropriate, rather than be pre-conceived.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0621	B003	Reinstate SHF032	<p>Shropshire Council considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0621	B004	Appendix 7 changes to be inserted (delivery timetable amendments) SHF18b & 18d to be delivered in the short & medium term within the plan period.	<p>Noted. Given the need to prepare a masterplan and design code in consultation with the public and Shropshire Council; likely lead-in times; the need to deliver associated infrastructure improvements; and the cautious approach taken to delivery assumptions by Shropshire Council, it is considered appropriate to retain the current assumptions identified within Appendix 7 of the draft Shropshire Local Plan for site SHF018b and SHF018d. However, we would note that Appendix 7 acknowledges that delivery timescales for many proposed allocations will change over the proposed Plan period and that it is not considered necessary to seek to phase the delivery of these allocations, although development on the larger sites, such as SHF018b and SHF018d will need to be undertaken in a coordinated manor to ensure that they deliver sustainable, comprehensive, high-quality and complementary development which meets local needs. On such sites aforementioned masterplanning exercises will be necessary to manage their development.</p>	No
A0621	B005	<p>Deletions in [square brackets], additions in <b>** asterisks **</b> Amend:  S15.1 (7) Land beyond the development boundary that is not part of the Green Belt is safeguarded for Shifnal's future development needs, beyond the Plan period after 2038. This extensive land release from the Green Belt is located to the east <b>[and to the south and west]</b> of the town as shown in Schedule S15.1(iii) and on the Policies Map.  Development of this land during the Plan period will only be permitted in 'very special circumstances' to meet Shifnal's development needs in accordance with national and local Green Belt policies.  Schedule S15.1(i). Residential Allocations: Shifnal Key Centre Add: <b>** Land east of Coppice Green Lane (SHF032) **</b>  Safeguarded Land Site Area Amend:  [Land between Park Lane and A4169 at Lodge Hill 46.1 hectares  [Land between A4169 and the western rail line 12.8 hectares]  [5.215 – 5.217 which refer to south-west safeguarded land.]  <b>** SHF018c (29.7ha) Land between Coppice Green Lane and Stanton Road **</b></p>	<p>Shropshire Council welcomes the support for Policy S15.1. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. Development guidelines for sites released for development will ensure the site design, layout and landscaping respects the character and significance of adjoining land uses. In the Green Belt, this is required to strengthen the boundary to the urban area to help maintain the openness and permanence of the Green Belt around Shifnal.</p>	No
A0621	B006	<p>Deletions in square brackets:  Schedule S15.1(ii). Employment Allocations: Shifnal Key Centre  Land east of Shifnal Industrial Estate, Upton Lane, Shifnal (SHF018b &amp; SHF018d)  [The development of land west of Upton Lane should consider the functional relationship with Shifnal Industrial Estate and the opportunity to link the two employment areas to: create a secondary access into the new employment area; and to alleviate the constraints imposed on Shifnal Industrial Estate through the existing intensity of the uses within this employment area].  [The priority given to Stanton Road as the primary access will require improvements to Stanton Road along its length.]  [The potential to operate a dedicated Park and Ride service should be investigated in partnership with appropriate local community groups and bus operators].</p>	<p>Shropshire Council welcomes the support for Policy S15.1. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. Development guidelines for sites released for development will ensure the site design, layout and landscaping respects the character and significance of adjoining land uses. In the Green Belt, this is required to strengthen the boundary to the urban area to help maintain the openness and permanence of the Green Belt around Shifnal. it is recognised that Park and Ride service operating from the employment allocation would encourage more provide vehicle movements between the Town Centre and the employment allocation. It is therefore proposed to make the following minor modification to the development guidelines for sites SHF018b and SHF018d to state "The potential to operate a Demand Responsive Transport service should be investigated in partnership with appropriate local community groups and bus operators."</p>	Yes

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0621	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	Not Specified	Yes	Not Specified	<p>Draft Policy SP1 sets out those issues considered of most importance in supporting Shropshire's growth and ensuring this takes place in a sustainable manner. Ruckley Estate and Harrow Estates support the approach that development at Shifnal will contribute to meeting local needs in the right place and should provide the right mix of new housing and employment. The principle of making efficient use of land whilst also balancing design, community and natural environment factors is also considered a sound policy basis. The allocation of circa 15ha of employment floorspace at SHF018b and SHF018d reflects this ambition, focusing development in a highly sustainable location to the east of the settlement of Shifnal, the strategy can assist in achieving a greater level of self-containment for the town and reducing the need to travel, which has substantial benefits across all three objectives of sustainability (economic, social and environmental, noting with respect to the latter that Shropshire Council has declared a climate change emergency). The proximity with the Lamledge Industrial Area (Shifnal Industrial Estate) and proposed residential allocations further ensures that it makes a key contribution to supporting the creation of a cohesive community to the east of Shifnal, thus according with part b) of the draft Policy.</p> <p>The proposed design approach to SHF018b and SHF018d is also considered to align with the expectation of part e) of the draft Policy for development to raise design standards, as well as making efficient use of land in line with part f) of the draft Policy. This is outlined in more detail in the accompanying Shifnal Settlement and Growth Study and Section 4 of these representations.</p> <p>Equally, sites SHF032 and SHF018c are considered to adhere to the strategic objectives and requirements of The Shropshire Test. These alternative safeguarded land options are sustainably located within walking distance of existing Shifnal town centre services and, being located on the east side of the town, clearly look towards Shifnal for these services and to the employment allocations for work opportunities, rather than Telford. This again will encourage local movement, reducing the requirement or desire to make longer journeys and therefore contributing to settlement containment. To this extent they should be preferred, and clearly, the alternative would also ensure the provision of additional community facilities and green space for the benefit of existing and future residents, supporting the creation of cohesive communities, thus according with parts b) and g) of the Shropshire Test.</p>
A0621	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>We support the identification of a requirement above the minimum, aligned with Shropshire's growth aspirations, which provides flexibility and contingency, it is a justified and effective means to ensure delivery of an appropriate scale of development to meet needs. The delivery of the employment development is critical to deliver on and facilitate the County's ambition for sustainable economic growth contained in the Economic Growth Strategy for Shropshire. This strategy aims to achieve £300 million of private sector investment over the next 5 years and at least 3,700 new jobs. Even at the lower end of the range, there is an identified need for employment land. SHF018 and SHF018d are suitable, sustainable locations for such development due to the links to the M54 corridor links and ability to serve local need within Shifnal. The Local Plan does not make any specific land allocations to meet the Black Country need. If the Government is to meet its housing target and boost housing supply, both within Shifnal and the Black Country, exceptional circumstances can be expected to continue to be applied through the plan making process. The release of land from the Green Belt, either now given the revised need, or safeguarded to meet future need, should, and must, continue to feature in the Shropshire plan under exceptional circumstances.</p> <p>Windfall sites are highly uncertain, particularly in the context of the current economic climate and brownfield opportunities are limited in the existing built-up area. In addition, these sites are not necessarily coming forward in locations of greatest housing need, such as Shifnal. Consequently, the reinstatement of allocation SHF032 and additional safeguarded land SHF018c have the potential to reduce the reliance on windfall sites whose delivery is highly uncertain. It also ensures that housing is being delivered where it is needed most. Windfall sites, most notably those derived from rural buildings and barns, are unlikely to serve Shifnal's housing need to the same extent that it would in other, more rural, parts of Shropshire.</p> <p>It is likely to be the case that there are a number of substantive risks linked to the future housing supply resulting from the Covid-19 pandemic. This includes ongoing challenges for the capacity of the construction industry on sites that had been assumed to be deliverable. As well as potential supply chain issues for housebuilders, a key risk comprises housebuilders or developers running out of funds to maintain the delivery previously anticipated. These issues are also likely to have a direct impact on the viability of some existing permissions and allocations, causing stalling of delivery and also requiring existing s106 commitments to be reviewed.</p>
A0621	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	Not Specified	Yes	Not Specified	<p>Support this policy. In taking forward a robust local plan which provides the necessary flexibility where assumed delivery may not reach expected levels, ensuring that opportunities for sustainable development in areas of strategic growth are maximised is considered critical. In this context, site SHF032, alongside site SHF018c, have the combined ability to perform positively, both as standalone options, and contributing to a comprehensive strategy for development, in accordance with the aims and objectives of sustainable development. Specifically, they respond to NPPF paragraph 72 relating to 'planning for large scale development' and offer the potential to both complement and benefit from the infrastructure improvements delivered as part of the adjacent proposed employment allocations. In appraising sustainable development in key centres such as Shifnal, and how this is applied, it is considered that SHF018c and SHF032 fulfil the economic, social and environmental objectives contained in the NPPF and should be incorporated into the plan as safeguarded land.</p> <p>Specifically, in combination, these land allocations create a strong basis for local living, to create a strong cohesive community and reduce the need to travel, with substantial benefits including a reduction in carbon footprint.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0621	B007	Allocate SHF032 and SHF018c	<p>It is understood that this representation primarily relates to the proposed strategy for Shifnal and not the content of draft Policy SP1. Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0621	B008	<p>Insert the asterisks below:</p> <p>2. Over the plan period from 2016 to 2038, *a minimum* of 30,800 new dwellings and around 300 hectares of employment land will be delivered. This equates to around 1,400 dwellings and around 14ha of employment land per annum. This Local Plan ensures that sufficient land in the right locations is available to achieve these growth aspirations, however the availability of land will be kept under review to ensure a continuous supply of suitable sites is available.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council also considers that it has a robust proposed housing land supply, sufficient to provide certainty that the proposed housing requirement is deliverable. Assumptions regarding non-delivery rates, windfall allowances and delivery timescales for proposed allocations are considered appropriate and respond to consideration of the specific characteristics, constraints and opportunities that exist across Shropshire, in specific settlements and on specific sites.</p>	No
A0621	B009	Allocate SHF032 and SHF018c	<p>Support for Policy SP4 is noted.</p> <p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations and proposed safeguarded land a proportionate and robust site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0621	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	No	Not Specified	<p>It is considered that the wording of draft Policy SP7 does not provide sufficient flexibility in line with the NPPF and NPPG requirements for plan making. In light of the impact on assumed housing delivery caused by the economic climate, combined with the proposed increase in the housing requirement contained in the revised standard methodology, the Black Country unmet need and recent delivery rates, the housing need is likely to be higher than that identified.</p> <p>Sustainable development opportunities adjacent to the settlement boundaries of identified growth locations, such as Shifnal, should therefore be maximised. Sites SHF018c and SHF032 are both sustainably located, within walking distance of existing Shifnal town centre services, and close to primary and secondary schools on the eastern side of Shifnal. All sites are well-located on the eastern edge of the Town, adjacent to existing and proposed employment uses and with convenient access via Stanton Road to the A41 and Junction 3 of the M54.</p> <p>Site 018c has been submitted previously for consideration as part of representations to Local Plan consultations on behalf of Harrow Estates. Whilst the sites do not currently form part of identified growth strategy, these representations seek to present their merits as a positive, suitable and justifiable option for residential-led development.</p>
A0621	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	No	Not Specified	<p>There are several key factors which support the need for additional allocations or safeguarded residential land around Shifnal as referenced in the Green Belt Exceptional Circumstances Statement:</p> <ul style="list-style-type: none"> <li>• Shifnal has experienced decades of restraint on its housing growth, which has resulted in significant demand for housing in the town. Shifnal needs to redress many years of under provision as a result;</li> <li>• Housing completions in Shifnal have traditionally been very low over the past two decades;</li> <li>• It is expected that the current rate of completions could result in the adopted housing land supply in both the current Local Plan and the Local Plan review being exhausted before 2024-25.</li> <li>• The slower rate of housing development in Shifnal has affected the affordability ratio in the town making Shifnal one of the most expensive markets in the County.</li> </ul> <p>With careful consideration given to siting, massing and landscape through master planning, SHF032, SHF018b, SHF018c and SHF018d could be released from the Green Belt and developed with limited harm to the Shropshire Green Belt and its overall integrity. In terms of hierarchy of land release from the Green Belt and development priority, it is considered that SHF032 and SHF018c provide a more suitable and therefore preferred option for development than land to the south west of Shifnal as currently identified for safeguarding beyond the plan period. SHF018c offers a genuine and more suitable alternative for safeguarded land to be identified in the Local Plan. Site SHF018c is scored as Good against the sustainability objectives in Stage 2a of the assessment. The rationale for retention of site allocation SHF032 within the Green Belt, despite previously being allocated for residential safeguarding is unclear. It has been demonstrated that SHF032 does not deliver a significant contribution to the asset's significance, and neither do views from or through SHF032 provide notable legibility of that significance. The Council's own evidence base supports the reinstatement of SHF032 as a residential allocation and proposed strategic safeguarded site SHF018c for inclusion within the Local Plan.</p>
A0621	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Not Specified	Yes	Not Specified	<p>This policy is supported. Shifnal represents a highly sustainable strategic location for economic growth to support Shropshire's wider economic objectives. In delivering on this potential for growth however, alongside allocations SHF018b and SHF018d, there needs to be appropriate provision for investment in residential development in the right locations. SHF032 and SHF018c are highly sustainable residential opportunities for additional safeguarded land on the eastern side of Shifnal, well placed for connections to the M54. In conjunction with the existing and allocated employment land to the east of Shifnal therefore, this additional safeguarded land will be essential in supporting the town's long-term economic growth needs.</p>
A0621	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	Not Specified	Yes	Not Specified	Support this policy
A0621	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Not Specified	Yes	Not Specified	<p>Support this policy. Sites SHF018c and SH032 have been identified as potential development opportunities in the M54 Growth Corridor Strategic Options Study which forms part of the Council's Local Plan evidence base. The study undertakes a review of the extent of the opportunity associated with the M54 corridor, key opportunity sites within the corridor and draws out the economic rationale for bringing forward strategic sites. With sites located in the Green Belt, the study findings will ultimately assist with forming a case to enable release of land, on the basis of exceptional circumstances. The Council should review their decision to withdraw SHF032 when this was previously deemed acceptable for Green Belt release.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0621	B010	Allocate SHF032 and SHF018c.	<p>Noted. The purpose of the draft Shropshire Local Plan is to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying residential development guidelines for settlements. The proposed residential development guidelines have been subject to detailed consideration by the Council, infrastructure providers and the community and as such it is only right that they are recognised as significant policy considerations.</p> <p>However, draft Policy SP7 recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such, draft Policy SP7 sets out a clear set of considerations which regard will be had to in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside for increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative the relevant guideline.</p> <p>As such, Shropshire Council considers that draft Policy SP7 is justified, effective and consistent with national policy. It is also considered that draft Policy DP1 is complementary in that it ensures the effective use of land and that the forms of housing delivered are responsive to the needs of local communities. Draft Policy SP7 forms part of the draft Shropshire Local Plan, which should be read as a whole, rather than forming a separate external consideration. Shropshire Council also considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p>	No
A0621	B011	<p>Add: Table SP11.1 Green Belt release by Location and Type:</p> <p>"Shifnal safeguarded land ha. figures amended with SHF018c and removal of Land SW of Shifnal."</p> <p>Reinstate SHF032 as a housing allocation for 80 units</p>	<p>It is understood that this representation primarily relates to the proposed strategy and allocations for Shifnal and not the content of draft Policy SP11. Issues raised relating to Shifnal are further addressed in the relevant settlement section.</p> <p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlement's characteristics, constraints and opportunities that exist.</p> <p>In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers that it has a robust proposed housing land supply.</p>	No
A0621	B012	Allocate SHF032 and SHF018c	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local plan in relation to the management and delivery of economic development and employment in Shropshire.	No
A0621	B013	n/a	Shropshire Council welcomes the support for Policy SP13 and the employment development strategy for Shropshire which is considered to be appropriate, effective, sustainable and deliverable.	No
A0621	B014	Allocate SHF032	Shropshire Council welcomes the support for Policy SP14 as part of the employment development strategy for Shropshire which is considered to be appropriate, effective, sustainable and deliverable. The matter of the decision not to release sites SHF018c and SHF032 from the Green Belt are considered in relation to Policy S15.1 Shifnal.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0622	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11	Yes	No	Yes	Syllenhurst Farm (NW of Woore's) is no longer a commercially viable farming unit and there is an opportunity to provide a mixed used site which will have a variety of benefits for the local community. Appreciate that this proposal has come forward at a late stage in the plan review. However, the changes to care over the past 12-18 months have highlighted the need for more community based residential and care based options. Woore's development boundary is so tightly drawn that it does not allow for any sustainable expansion.
A0622	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Yes	No	Yes	Agree a mix of dwellings should be provided to meet the needs of local communities. Whilst also agree with the general sentiment that larger development sites could include specialist housing designed to meet the needs of older people, there may also be opportunities to provide one-off specialist care and retirement facilities. The current Covid crisis has gravely highlighted the shortcomings in the nation's approach to elderly care through the distinct lack of age-related housing options. The new local plan needs to revisit its policy guidelines to take account of this.
A0622	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.2	Yes	No	Yes	Agree with Woore's proposed Community Hub status but feel the draft Policy is not effective as Woore only has a residential guideline of 88 dwellings, whereas other proposed Community Hubs' are much higher. Para 2 of draft Policy S11.2 indicates development should be delivered within development boundaries, but Woore's is so tight it leaves no room for sustainable expansion. A mixed site allocation is suggested to the north of Woore, which can provide housing as well as facilities such as a doctor's.
A0622	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Yes	No	Yes	We support the general ethos of this policy, however it has limited focus on our ageing population and the needs for more care and retirement facilities. Over the coming 20 years there will be a soaring demand for care home spaces as people live longer.
A0622	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP8	Yes	No	Yes	Agree that Hubs are key rural services but suggest that appropriate development should be permitted on allocated sites and other sustainable sites within and adjacent to the settlement development boundaries. Therefore consider draft Policy SP8 has not been positively prepared and is ineffective in allowing appropriate development in certain circumstances to come forward.
A0623	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	Not Specified	Not Specified	The draft Shropshire Local Plan should not include a prescriptive policy on housing mix, size, types or tenure as needs will change over the proposed Plan period. Such a policy would potentially undermine viability and delivery of sites. Consider any such policy should be dealt with as a supplementary planning document which can be regularly updated and, in addition, there should be no 'blanket' policy – standards should reflect the needs of specific settlements and areas.
A0623	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Not Specified	Not Specified	Not Specified	In line with response to Policy DP1, imposition of an inflexible requirement for the delivery of serviced plots on sites could again undermine the viability and deliverability of sites.
A0623	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	Not Specified	Not Specified	Paragraph 20 of the NPPF states that strategic policies should make provision for housing, including affordable housing. Paragraph 62 of the NPPF goes further to distinguish that affordable housing can be provided off-site or an appropriate financial contribution paid in-lieu if it can be robustly justified.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0622	B001	Our client's land should be considered for development as part of the LPR. The guideline for Woore should be expanded to at least 150 dwellings plus additional facilities. Para 5 of S11.2 should be revised to read: "Development proposals in Woore, Irelands Cross and Pipe Gate Community Hub will be expected to positively respond to policies and guidelines within the adopted Woore Neighbourhood Plan and wider local development needs"	Shropshire Council considers the proposals for Woore is appropriate. It should be noted that the Woore Neighbourhood Plan was recently adopted and allows for housing development in the settlement.	No
A0622	B002	Suggest draft Policy DP1 is revisited to cover these concerns regarding provision of accommodation for the elderly. Also question figures in Para 4.40. There is now both regionally and nationally a clear demand for housing with care options and a new approach is required towards the retirement community sector. Government is wishing to widen housing options for older people with almost three quarters interested in an alternative to a care home if they need initial support. An extra bullet needs to be added to DP1.1 to allow for one-off specialist care living.	It is also considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically: -Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings. -Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people. -Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation.	No
A0622	B003	Para S11.2 should be amended to consider a site allocation to the north of Woore off the A51.	Shropshire Council considers the proposals for Woore is appropriate. It should be noted that the Woore Neighbourhood Plan was recently adopted and allows for housing development in the settlement.	No
A0622	B004	We suggest that a network of new facilities could be created across the County and not just focused on the main towns. Some of the community hubs are well placed to accept and appropriate mix of housing, elderly care facilities, medical centres, recreational facilities etc. The policy n=should be modified to allow this network of facilities to come forward.	Other policies in the Local Plan provide for the housing, services and facilitates and as the Plan should be read as a whole, the Council does not consider it necessary to make any changes.	No
A0622	B005	Suggest the wording of para 1 of draft Policy SP8 is varied to include appropriate development on the edge of Community Hubs where a need can be proven for the development.	The purpose of the draft Shropshire Local Plan to provide a framework for the sustainable development of Shropshire. A key part of this process involves establishing an appropriate strategy for the level and distribution of development. This is achieved, in part, by identifying appropriate types and locations for open market residential development, including through identification of development boundaries where it is considered appropriate to do so. Draft Policy SP8 reflects the draft Shropshire Local Plan's urban development focus and strategy of focusing growth in strategically agreed locations (set out in Draft Policy SP2) whilst supporting rural communities by enabling some controlled development to maintain local sustainability. Shropshire Council considers that the proposed development strategies for each Community Hub settlement, are appropriate, effective, sustainable and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Identification of proposed site allocations has been informed by a proportionate and robust site assessment process.	No
A0623	B001	Consider housing mix, size, types or tenure should be dealt with as a supplementary planning document which can be regularly updated and, in addition, there should be no 'blanket' policy – standards should reflect the needs of specific settlements and areas.	Noted. Shropshire Council considers the proposed requirements of draft Policy DP1 positively respond to the housing need evidence within the Strategic Housing Market Assessment (SHMA), which is considered a robust and proportionate evidence base for informing policies on housing need. It is considered that the draft Policy provides an appropriate balance between providing certainty to all parties (the decision maker, local communities and the development industry) and flexibility to allow for innovation and site specific/location specific factors.	No
A0623	B002	In line with response to Policy DP1, imposition of an inflexible requirement for the delivery of serviced plots on sites could again undermine the viability and deliverability of sites.	Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above the specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position. It is also considered that this draft Policy provides appropriate flexibility to respond to the differing circumstances of specific sites and communities. The 24 month marketing timescales proposed within the draft Policy are considered appropriate and balance the need to provide an appropriate opportunity for potential self-builders/custom-builders to secure the plot, whilst also recognising the relationship to the wider development of the site.	No
A0623	B003	Part 1B of Policy DP3 and its reference to 'exceptional circumstances' must therefore be deleted as it directly conflicts with guidance contained within the NPPF.	Noted. It is considered that the Policy complies with national policy. The exceptional circumstances requirement wording reflects Para 62 NPPF requirements which expect on site provision unless a financial contribution in lieu can be robustly justified or that "the agreed approach contributes to the objective of creating mixed and balanced communities".	No



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A0623	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	Not Specified	Not Specified	The 2019 Spring Statement included a commitment that by 2025 the Government will introduce a Future Homes Standard for new build homes to be future-proofed with low carbon heating and 'world-leading levels of energy efficiency'. The Consultation document (October 2019) highlighted that changes to Part L, Part 6 and Part F of the Building Regulations are anticipated to come into force by mid/late 2020.
A0623	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Policy S1.1 Albrighton and DP28. Communications and Transport	Not Specified	Not Specified	Not Specified	Aligned to the three overarching objectives of sustainable development identified within paragraph 8 of the NPPF, Policy DP28 seeks to deliver a sustainable pattern of growth and development, investing in the necessary communications and transport infrastructure and services, providing remote access to services and employment and making available accessible, safe, reliable, low carbon transport modes and active travel choices.
A0623	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S1.1	Not Specified	No	Not Specified	The draft Shropshire Local Plan does not fully realise the opportunities of RAF Cosford and the delivery of homes nearby to meet this significant economic growth. The draft Shropshire Local Plan fails to recognise the inherent sustainability of Albrighton and years of suppressed housing growth which have led to an ageing population, rising housing prices outstripping the Shropshire average, and an inability for first-time buyers to get onto the housing market. A more proportionate amount of safeguarded land should be proposed at Albrighton due to its inherent sustainability. There is significant concern regarding the suitability of the sites proposed for safeguarding at Albrighton. For consistency and clarity, It would be beneficial to allocate site reference numbers to each of the safeguarded sites so that the Policies Map can be cross referenced at the appropriate points within the Local Plan Review. Concerned that proposed safeguarded site at land bounded by Kingswood Road, High House Lane and the By-Pass (P35) will significantly alter the form and character of Albrighton. The site is on the periphery of the village and any development will materially change gateway views on a key approach route into the village, impacting upon the setting of the Albrighton Conservation Area, within which part of the site is located. The SA scoring for the site is also incorrect in relation to distances to facilities (Primary School, GP Surgery and Library). This site is not a suitable site for future housing development and should remain in the Green Belt. For it to be released from the Green Belt as safeguarded land is not justified, it will render the plan unsound.
A0623	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	Not Specified	Not Specified	Not Specified	In the context of this test, Albrighton is a sustainable location for further housing growth given its excellent social, community and transport infrastructure, and the approach advanced in the draft plan to support the growth of RAF Cosford as a strategic employment site (Policy S21). It is on the edge of the Black Country and wider Greater Birmingham conurbation, with a regular rail service to Wolverhampton, Birmingham City Centre, Telford and Shrewsbury, and is in close proximity to the M54 growth corridor (comprising the employment sites at i54, ROF Featherstone, and the estates on Wobaston Road).
A0623	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	Do not agree that the plan's spatial strategy, in particular the amount of growth proposed for Albrighton (500 dwellings), will realise the opportunities identifies in the draft Plan and SA to improve affordability or maximise the viability and vitality of existing services and facilities, nor alleviate existing pressures from pent up demand. The spatial strategy also does not reflect where significant job creation is expected (such as at Cosford and along the M54 / A5 growth corridor). At the same time, the spatial strategy also fails to respond to where the Black Country shortfall arises. Greater development should be in closer proximity to the Black Country to meet this need where it arises. There is long-term decline in Albrighton's population and a more recently static picture which is materially changing the demographic profile of the town.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0623	B004	Policy DP11 should therefore be deleted as it will be a duplication of national guidance.	The Council considers that this policy introduces effective and appropriate policy requirements for new development to contribute to reducing impact on climate change, whilst also ensuring compliance with national policy and legislation and ensuring the continued viability of development.	No
A0623	B005	As set out in response to Policy SP2, do not consider that the strategic approach aligns with the intent of Policy DP28 and specifically in the artificial suppression of Residential Growth in Albrighton, one of the county's most sustainable settlements which is closely related to both the GBBCAHMA and the strategic allocation proposed at RAF Cosford with high quality sustainable transport connections to both.	Shropshire Council considers that the proposed development strategy for Albrighton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.	No
A0623	B006	The proposed safeguarded site P35 is not a suitable site for future housing development and should remain in the Green Belt. For it to be released from the Green Belt as safeguarded land is not justified, it will render the plan unsound. Land east of Newport Road, Albrighton (ALB015), should be allocated for around 218 dwellings.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Albrighton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Furthermore, proposed allocations and proposed safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No
A0623	B007	Our client's land east of Newport Road, Albrighton, should be considered for allocation for 218 dwellings and 221ha of land at RAF Cosford for employment, amongst other benefits	It is understood that this representation primarily relates to the proposed strategy for Albrighton and not the content of draft Policy SP1. Shropshire Council considers the proposed development strategy for Albrighton and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No
A0623	B008	Given the clear evidence that Albrighton's housing delivery remains constrained despite a pressing need and growing demand, and the anticipated and planned significant employment growth at Cosford, a greater quantum of growth should be directed to Albrighton to ensure the plan is consistent with national policy, positively prepared, effective and justified. The site to the west of Newport Road can make a significant contribution to this, as well as the wider county's housing needs.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. Shropshire Council also considers that the proposed development strategy for Albrighton and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Furthermore, proposed allocations and proposed safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0623	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Not Specified	Not Specified	Not Specified	The identified housing guideline for Albrighton is limited to 500 dwellings. This level of growth does not reflect its exceptional sustainability which is clearly evidenced within the Council's 'Hierarchy of Settlement Paper', including a railway station with services to Cosford, Wolverhampton, Birmingham, Telford and Shrewsbury, a wide range of services and facilities and also in close proximity to the Strategic Employment Site at RAF Cosford. Nor does it recognise the planned significant job creation at Cosford, contrary to NPPF paragraph 92. Indeed the artificial suppression of growth at Albrighton is exemplified by the plan's inconsistency in directing the same amount of new housing to Craven Arms, which is much further from employment opportunities and is a significantly reduced provision of services and amenities compared with Albrighton. As drafted Policy SP3 is therefore not positively prepared or consistent with national planning policy.
A0623	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	Not Specified	Not Specified	Not Specified	Policy SP4 'Sustainable Development' duplicates the NPPF and reiterates the principles set out within Section 38 (6) of the Planning and Compulsory Purchase Act 2004.
A0623	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	Not Specified	Not Specified	Albrighton is one of the most sustainable settlements within the county and also one of only a small number which is constrained by the West Midlands Green Belt given its proximity and functional relationship with the built up area of Wolverhampton. As such unlike other more rural and less sustainable settlements, there are limited opportunities where windfall sites can come forward to meet local need at Albrighton. Although provision is made for safeguarded land at Albrighton, it is in no way proportional to the village's sustainability and role in the settlement hierarchy. Table SP11.1 underlines this point. 92.8ha of safeguarded land for future residential development is proposed at Shifnal, which sits within the same tier in the settlement hierarchy, albeit is larger and therefore has a larger allocation of 1,500 dwellings. In contrast a much less proportional provision of safeguarded land for residential development at Albrighton of 19.9ha is proposed.
A0623	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Not Specified	Not Specified	Not Specified	In considering the implications of the strategic M54 growth corridor for Albrighton, the 'M54 Growth Corridor – Strategic Options Study' (June 2019), identifies RAF Cosford as one of the key strategic sites considering the existing levels of employment it provides and also future expansion and opportunities. This reinforces our view that the employment growth proposed for Cosford is significant and therefore a greater provision of housing is needed in close proximity to sustainably realise the employment allocation's potential.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0623	B009	Land east of Newport Road, Albrighton (ALB015), should be allocated for around 218 dwellings.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Albrighton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Furthermore, proposed allocations and proposed safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0623	B010	Policy SP4 would be more effective if further details were provided relating to how the presumption will be applied locally, otherwise it should be deleted.	Noted. Shropshire Council considers draft Policy SP4 is appropriate and consistent with national policy. It is complemented by the wider draft Policies within the draft Shropshire Local Plan.	No
A0623	B011	If the plan is to take a consistent approach and is positively prepared and effective a greater provision of safeguarded land should be proposed at Albrighton.	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Albrighton and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the characteristics, constraints and opportunities that exist and the need to identify safeguarded land to meet needs beyond the current Plan period.	No
A0623	B012	The employment growth proposed for Cosford is significant and therefore a greater provision of housing is needed in close proximity to sustainably realise the employment allocation's potential.	<p>The draft Shropshire Local Plan identifies that RAF Cosford will be considered for employment development related to "its existing role as a centre of excellence for both UK and International Defence Training, host a specialist aviation academy, support opportunities to co-locate other Ministry of Defence units and activities, facilitate the intensification and expansion of the RAF Museum Cosford and allow the formation of a new headquarters for the Midland Air Ambulance Charity". There is no intention to locate employment development on the site beyond its use by the military and charitable organisations.</p> <p>In this instance, it is not considered necessary to further increase the level of new housing provision in Albrighton since the use of RAF Cosford for employment purposes will only create a housing need for military accommodation and not for further open market housing development.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0624	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1	Yes	No	Yes	<p>Policy S18.1 fails to plan positively for the opportunity to accommodate higher amounts of growth in Whitchurch, to take advantage of the arrival of HS2 in Crewe and associated economic and housing growth expected to be generated.</p> <p>The settlement guideline figure for Whitchurch should be increased reflecting that it is capable of accommodating a higher amount, reflecting its sustainability and range of services and facilities it contains making it a highly sustainable location.</p> <p>Whitchurch appropriate location as a highly sustainable settlement with a wide range of facilities and services and sustainable travel connections to strategic settlements such as Shrewsbury and Crewe. Additionally, strategically located relative to HS2 and other economic opportunities which new development in Whitchurch can support &amp; benefit from. Area to the west of Whitchurch particularly sustainable &amp; the promoted site is well related to the town centre, local shops and services and served by sustainable modes of transport. Lack of allocations in the West Need for additional sustainable sites as insufficient housing supply identified – site allocation offers opportunity to address this by providing range and mix of good quality family and affordable dwelling.</p> <p>Representation sets out relevant background including: relevant national &amp; local policy context ( Appendix compares site performance against SP1) &amp; evidence base ; site &amp; surroundings context including relevant local planning permissions; Compatibility with Surrounding Uses; specific site characteristics &amp; sustainability factors and benefits ; critique of the approach to identifying sufficient housing land supply in Whitchurch and the Council’s identification and assessment of potential sites</p> <p>Seek allocation of land south of Wrexham Road, Whitchurch for residential development. Submission seeks to demonstrate that site is suitable, sustainable and deliverable in the medium term and should be allocated as a sustainable housing site for residential development to meet housing needs. Development is capable of contributing positively to the achievement of a number of identified strategic objectives and policies of the Local Plan. None of the Council’s assessments of the sites have identified technical or environmental constraints that would prevent development. Proposal has also been informed by technical assessments including ecological, Transport Statement, a preliminary Flood Risk Assessment (FRA) and drainage strategy which demonstrates absence of known ecological, highway, flood constraints that would prevent site development.</p> <p>The site has been previously recognised as a suitable housing site, having been a proposed allocation in the North Shropshire District Local Plan in 2004 but not required to meet need at that time. The location has more recently been recognised in the Council’s own reports and assessments to be in a sustainable location. There is scope to improve the sustainability and connectivity of the site to further improve its sustainability.</p> <p>Site is in single ownership with willing landowners &amp; free from constraints that would prevent development and is viable &amp; capable of being deliverable and developable. It can therefore contribute to housing supply in the short (0-5 years) and medium (6-10 year) horizons. It can accommodate approx.325 dwellings</p> <p>The submitted Development Framework to accompany the representations has been prepared to demonstrate the sites sustainability &amp; support the inclusion of land at Wrexham Road, Whitchurch as a sustainable housing allocation. It sets out the policy, economic, local &amp; site context; constraints &amp; opportunities and details the sustainability benefits achievable. It responds to strategic and site-specific considerations &amp; specifically demonstrates how development of the site could integrate into the wider area and provide a range of sustainability benefits, including pedestrian and cycle connections &amp; climate change adaptation and mitigation measures. A number of technical reports have been prepared to assess the site &amp; an illustrative masterplan prepared to reflect considerations. In line with evidence the Development Framework demonstrates there are no significant technical constraints or environmental issues that would prevent development and that any impacts arising are capable of being minimised, mitigated or compensated for. The analysis of the site and subsequent development framework illustrates how a high quality development which responds to the attributes of the site can be achieved.</p>
A0624	B001 Cont'd						<p>Council has failed to take an effective or justified approach to the identification of potential housing allocations in Whitchurch. Wrexham Road site excluded despite meeting the requirements. There are a number of specific inconsistencies in the assessment of the site in the SLAA2018 and Whitchurch Site Assessments for the SAMDev. In each case the site has been marked negatively in the SLAA2018 despite scoring positively previously. The approach taken in the SASA is also flawed for reasons set out in the response and the conclusions reached reflect this. Highlights lack of consideration given to mitigation &amp; consideration of proximity and disagrees with the scoring in relation to the identified aspects as detailed pages 19- 22 of the response. A reassessment of the site against the criteria used in the SASA is provided at Appendix 4 of the response.</p> <p>The approach taken by the Plan in seeking to meet housing and employment requirements is based of disaggregation of the overall requirements to the settlements (with requirements reflective of the standing of a settlement in the hierarchy) in order to achieve a sustainable and appropriate pattern of development. Thus, if the amounts of development envisaged for the priority settlements are not achieved, the underlying principles and of the Plan and ability to achieve sustainable development. Given identified flaws in the approach taken to the identification of sufficient housing supply in Whitchurch , which may result in not meeting requirements for each settlement, the soundness of the plan is threatened by virtue of failing to plan positively manner, being ineffective and not being in accordance with national policy. Specific issues detailed include inappropriate &amp; too low a settlement requirement given sustainability, hierarchy score, strategic role &amp; opportunities for and to support growth, including HS2, also potential over reliance on delivery of existing commitments &amp; windfall.</p> <p>Unclear in terms of what allowance, if any, has been made in respect of non-delivery or delayed delivery of committed and allocated sites or what assumptions have been made about delivery from commitments. The evidence base &amp; planning applications identify a number of major constraints (threats to delivery) in relation to proposed allocations which set out in the response &amp; are summarised at Appendix 5 . A number of sites with full permissions 8-10 years old have not delivered any dwellings &amp; no evidence that they will. The SASA also identifies issues with the proposed allocations which threaten the ability to either deliver or deliver within the timescales envisaged. The potential issues with the proposed allocations support the assertion that non-allocation of Wrexham Road land in favour of other sites is not supported by the evidence base. There is a need to build in flexibility in sources of supply which will allow a range and choice of sites reducing the delivery risk which is currently inherent and ensure the plan is consistent Government guidance meets the test of soundness of being “effective” – i.e. deliverable over its plan period.</p> <p>In addition to the quantitative supply shortcomings set out, there are qualitative supply issues including role of small sites( less than 10 dwellings) many of which will not provide needed affordable housing and not be capable of accommodating features or facilities that might benefit the wider community (such as public open space). Despite the strong evidential requirements in PPG for relying on windfall allowance there is none only a contrived figure, the difference between the settlement guidance figure less completions and the total supply from commitments and allocations. As such no reliance can be placed on any allowance made for windfall housing. Conclude therefore that the approach to housing supply is unsound, not justified and ineffective and contrary to national planning policy.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0624	B001	The settlement guideline figure should be increased above 1,600 dwellings. Sustainable sites capable of accommodating additional growth available include the allocation of land at Wrexham Road.	Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.	No
A0624	B001 Cont'd			

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0624	B002	Sustainability Appraisal	Whitchurch	Yes	No	Yes	Council has failed to take an effective or justified approach to the identification of potential housing allocations in Whitchurch. Wrexham Road site excluded despite meeting the requirements. The SASA takes a crude and fundamentally flawed approach to the assessment of sites which results in the land at Wrexham Road, Whitchurch (site ref. WHT026) being scored significantly lower than it should. The SASA takes an inconsistent approach in relation to previous Council and Planning Inspectors' assessments, it fails to recognise the ability to mitigate potential impacts, consideration of proximity is crude and approach does not recognise the ability to provide additional facilities on larger sites (such as the land at Wrexham Road which serve to enhance their sustainability). It does not take proper account of the three objectives of sustainable development set out in the National Planning Policy Framework. The result is that the site has been ranked much lower than the proposed allocations in Whitchurch. A re-assessment, however, which is based on a more objective assessment and takes account of previous evidence base and Council assessments results in it scoring higher than all but 1 of the proposed and saved allocations. (Section 5 of the representation details) . Issues with the scoring detailed pages 19- 22 of the response . A reassessment of the site against the criteria used in the SASA is provided at Appendix 4 of the response
A0624	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	The Framework and Planning Practice Guidance (PPG) strongly support the position taken by Shropshire to identify a housing requirement which is higher than that implied as a 'minimum' level through the standard method. This particularly recognises & commits to the economic ambitions relating to the M54 growth corridor. Planning for higher levels of housing need is also prudent in the context of the opportunity presented by the County's proximity to and functional relationship with strategic drivers of growth beyond the County including opportunities presented by HS2. Furthermore planning for a higher level of provision is necessary to respond to the pressing need for affordable homes delivery to address historic under-provision. Appropriate to plan for a higher amount of housing in recognition of proximity to housing market areas (HMAs) facing significant constraints on their ability to meet full need (e.g. the Greater Birmingham/ Black Country HMA). The Local Plan housing requirement is supported as a minimum, but the Council should give consideration to take a more positive approach in providing for identified needs and opportunities.
A0624	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Yes	No	Yes	The Local Plan should not include a prescriptive policy on housing mix, size, types or tenure. Precise housing needs will change over the plan period. Such a policy would potentially undermine viability and delivery of sites and present the risk that changes in housing need arising in later years of the plan period are not met. This presents a risk of the plan being ineffective in this regard. An alternative approach would be to deal with such matters through a supplementary planning document which can be regularly updated.
A0624	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Yes	No	Yes	Paragraph 20 of the NPPF states that strategic policies should make provision for housing, including affordable housing. Paragraph 62 of the Framework goes further to distinguish that affordable housing can be provided off-site or an appropriate financial contribution paid in-lieu if it can be robustly justified. Reference to the identification of 'exceptional circumstances' in part 1B of Policy DP3 directly conflicts with guidance contained within the Framework
A0624	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Yes	No	Yes	The 2019 Spring Statement included a commitment that by 2025 the Government will introduce a Future Homes Standard for new build homes to be future-proofed with low carbon heating and 'world-leading levels of energy efficiency'. The Consultation document (October 2019) highlighted that changes to Part L, Part 6 and Part F of the Building Regulations are anticipated to come into force by mid/late 2020.
A0625	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.1 Oswestry	Yes	Yes	Not Specified	The site at the Swan Hill/Broglyntyn Registered Park should be an allocation for housing
A0626	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	Trefonen does not have any "significant employment opportunities" or "peak time public transport". It is the only proposed Hub settlement with neither of these key requirements.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0624	B002	A reassessment of the sites should be carried out to correct the flaws identified and a more rounded assessment carried out.	The Council considers that the SA and site assessment process complies with the Environmental Assessment of Plans and Programmes Regulations 2004 and is a robust, proportionate and fair way of evaluating sites. No change proposed.	No
A0624	B003	Give consideration to a more positive approach to housing requirement - higher than identified.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.	No
A0624	B004	Deal with matters of housing mix, size, types or tenure through a supplementary planning document rather than Policy.	Noted. Shropshire Council considers the proposed requirements of draft Policy DP1 positively respond to the housing need evidence within the Strategic Housing Market Assessment (SHMA), which is considered a robust and proportionate evidence base for informing policies on housing need. It is considered that the draft Policy provides an appropriate balance between providing certainty to all parties (the decision maker, local communities and the development industry) and flexibility to allow for innovation and site specific/location specific factors.	No
A0624	B005	Reference to the identification of 'exceptional circumstances' in part 1B of Policy DP3 should be removed.	Noted. It is considered that the Policy complies with national policy. The exceptional circumstances requirement wording reflects Para 62 NPPF requirements which expect on site provision unless a financial contribution in lieu can be robustly justified or that "the agreed approach contributes to the objective of creating mixed and balanced communities".	No
A0624	B006	Policy DP12 should be deleted as it will be a duplication of national guidance	The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that this proposed amendment is not necessary. No change proposed.	No
A0625	B001	The site at the Swan Hill/Brogyntyn Registered Park should be an allocation for housing	Shropshire Council considers that the proposed development strategy for Oswestry and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The proposed allocations have been identified through an appropriate, proportionate and robust site assessment process. The southern element of the site was assessed under ref OSW028. It was rejected as it forms part of a registered park. Likewise, the land north of this site reference is also Registered Parkland, and is therefore unsuitable for development and there are more suitable sites elsewhere (Park Hall).	No
A0626	B001	Trefonen should be a rural settlement with no development boundary. Any development should conform to the Village Design Statement	Shropshire Council undertook a robust assessment during the Hierarchy of Settlement process and Trefonen's services and facilities meant that its score resulted in it being a Hub. Notably there are no housing allocations in the settlement as part of this Plan Review.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0626	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	Trefonen does not have any “significant employment opportunities” or “peak time public transport”. The additional wording “a larger range” of services and facilities to compensate for the lack of these fundamental criteria is not defined, and introduces an element of subjective assessment, which is contrary to the aims to the Hierarchy of Settlements Methodology for objective comparison between settlements. The Threshold score of 48points for Hub status was set using flawed and inaccurate scoring in the original 2017 Table 10 and has not been changed since.
A0627	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3, DP4, DP5, DP6 and DP7	Not Specified	No	Not Specified	Whilst draft Policies DP3, DP4, DP5, DP6 or DP7 require reasonable access to local services by walking, cycling or public transport (where access is via public transport this should be 7 days a week for services like GP’s, dentists and pharmacies appointments for which are often not available during peak times), none refer to daily access to employment. Sustainable travel to work is key for the suitability of developments, meeting Climate Emergency aims, aims of draft Policy SP3, and Sustainability Objectives SO5, SO6, & SO12. If employment is not available in the settlement then there must be daily peak time public transport - as these draft Policies aim to assist lower income households, this needs to be 7 days week and cover early starts late finishes (e.g. 6.00am 10.00pm), as many low paid jobs involve weekend work and shifts. Public transport links to services are key if lower income households in affordable properties are not to become burdened with additional costs/isolated.
A0627	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP4, DP5 and DP7	Not Specified	No	Not Specified	Draft Policies DP4, DP5 and DP7 must include limitations on cumulative exception sites. Cumulative impact from development occurring under these draft policies (multiple or phased “exception” developments) would be the same or arguably greater than the impact of a large development on rural settlements, over the course of time. Particularly relevant to smaller settlements where different landowners promote development on adjoining fields. Do not consider this is the intention of the National Planning Policy Framework (NPPF) in allowing rural exceptions.
A0627	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP4	Not Specified	No	Not Specified	Draft Policy DP4 does not include a definition of scale. This is only set out in the proposed explanation to the draft Policy (para 4.57), which says there is an “expectation” sites will not exceed 25 dwellings adjacent to Strategic, Principal & Key Centres. That is very open to interpretation/not binding and there is no threshold for other settlements (normally locations for such sites), so gives no confidence to local residents. Note that draft Policies DP5 and DP7 include limitations/guides on the scale of development and believe draft Policy DP4 requires the same (particularly for Community Hubs & Clusters and other rural settlements). There is also no cumulative impact limitation on multiple developments adjacent to settlements, which is also required (particularly for Community Hubs & Clusters and other rural settlements).
A0627	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP7	Not Specified	No	Not Specified	Do not consider draft Policy DP7 is required, as para 77 of the National Planning Policy Framework (NPPF) allows for viability discretion on 100% Affordable Housing Rural Exception developments in ‘Countryside’ outside existing settlements. Land value is a key factor in the viability of 100% Affordable Exception schemes, if landowners foresee higher values via cross-subsidy exception, they will hold out for such schemes, reducing the overall percentage of affordable housing provision. Without prejudice to the above, if draft Policy DP7 is retained, disagree with the minimum 70% Affordable Homes requirement in DP7.1(f). Consider this should mirror open market affordable housing requirements (so 90% affordable in the north and 80% affordable in the south), to reflect identified local needs. Unclear how viability (as referenced within DP7.1(a)) will be determined or what is an acceptable level of profit?
A0627	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP7	Not Specified	No	Not Specified	Para 1a of Draft Policy DP7 refers to unviability of 100% Affordable Exception schemes – how will this be determined and what is an acceptable level of profit (how and by who will this be assessed)? Is this legally a consideration under the Planning Act? Without public grant, viability is synonymous with profitability. Developers are profit led and will seek to maximise Open Market housing within any development to maximise profit. Clearly, every development differs in terms of land values and build costs related to site factors, and saleability of Open Market housing.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0626	B002	<p>HoS must be amended and support other relevant policies in the Plan.</p> <p>In Para 5.41 the relaxation wording must be removed...Remove "In circumstances where there is no regular public transport service; and/or high speed broadband; and/or multiple significant employment opportunities, a larger range of services and facilities would be necessary to compensate to enable a settlement to achieve the specified point's threshold"</p> <p>the requirement to have both "significant employment opportunities" and "peak time public transport" for Hub status must be met.</p>	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen.</p> <p>Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.</p> <p>As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.</p> <p>Shropshire Council also considers that the development strategy proposed for Trefonen, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable. It is noted that the proposed requirements in draft Policy S14.2, which applies to the proposed Community Hubs in the Oswestry Place Plan Area - including Trefonen, includes "development proposals will be expected to positively respond to policies and guidelines within any relevant community-led plans and local needs."</p>	No
A0627	B001	Add a requirement to have access to employment and secondary services & facilities into DP3-DP7.	Shropshire Council recognises that the settlements across Shropshire with an identified affordable housing need are diverse. It is considered that the proposed requirements of draft Policies DP3-DP7 are appropriate and balance the need to ensuring affordable housing provision occurs on appropriate sites and in appropriate locations with the need to effectively contribute to meeting needs for affordable housing.	No
A0627	B002	Add wording into Policy DP4, DP5, & DP7 to address cumulative impact from multiple "small" Affordable Exception developments	Shropshire Council considers that draft Policies DP4-DP7 are appropriate and will effectively contribute to meeting needs for affordable housing. These draft Policies include a requirement to demonstrate a proven local affordable housing need and where appropriate, include cross-reference to para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity.	No
A0627	B003	<p>Add limitations of scale into draft Policy DP4: "Adjacent to Strategic, Principal or Key Centres the scale of the development will solely be dictated by the evidence of local affordable housing need, but will not normally exceed 25 dwellings. Adjacent to Community Hub or Community Cluster or other Settlements the scale of the development will solely be dictated by the evidence of local affordable housing need, but will not normally exceed 10 dwellings".</p> <p>Add wording into draft Policy DP4 to address cumulative impact from multiple "small" Affordable Exception developments – particularly relevant to smaller settlements where this would have a greater impact if different landowners promote development on adjoining fields.</p>	<p>Noted. As specified within draft Policy DP4, the primary factor that determines the size threshold for affordable housing exception sites is local need, which for most rural settlements is likely to be less than 25 dwellings. However, draft Policy DP4 also includes a cross-reference to para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity. It is considered that this effectively manages cumulative impact.</p> <p>Para 4.60 of the proposed explanation to draft Policy DP4 recognises that Strategic, Principal and Key Centres are likely to demonstrate high affordable housing need, which should not automatically translate into larger exception sites. As such para 4.60 of the proposed explanation to draft Policy DP4 also indicates a general expectation that the maximum size for affordable exception sites will not exceed 25 dwellings, although there is also recognition that there may be circumstances where exceeding this size threshold are appropriate. This general expectation on site size is not intended to be limited to Strategic, Principal and Key Centres, as such a minor modification is proposed to this paragraph to clarify this matter. It is also intended that further information on affordable exception schemes will be provided within the updated Type and Affordability of Housing Supplementary Planning Document.</p>	Yes
A0627	B004	Remove DP7 completely; Or, if not, change DP7.1.f wording Delete at least 70% and require it should mirror the Open Market development Affordable Homes requirements for its location within the county i.e. it should be at least 90%AH in the North and 80%AH in the South to reflect identified local needs.	<p>Shropshire Council considers that draft Policy DP7 is consistent with the National Planning Policy Framework (NPPF) and provides beneficial supplementary local policy on Cross-Subsidy Schemes.</p> <p>The affordable housing thresholds referenced in draft Policy DP3 for Open Market Housing and the proposed minimum amount of affordable housing on Cross-Subsidy Schemes in draft Policy DP7 are consistent as they are both reflective and responsive to development viability.</p> <p>Development viability will be determined through open book appraisal at the Planning Application stage.</p>	No
A0627	B005	<p>Add wording into draft DP7 defining how "unviable" will be assessed – submission information and process for review &amp; assessment.</p> <p>Add wording into draft DP7 defining "viability" e.g. possibly by maximum profitability margin limits over development costs.</p>	<p>Shropshire Council considers that draft Policy DP7 is consistent with the National Planning Policy Framework (NPPF) and provides beneficial supplementary local policy on Cross-Subsidy Schemes.</p> <p>Development viability will be determined through open book appraisal at the Planning Application stage.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0627	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	<p>The Hierarchy of Settlements Assessment (HoS) and as a result the Draft Shropshire Local Plan is unsound as determination of settlement status is fundamentally flawed. The Hierarchy of Settlements Assessment (HoS) contains additional relaxation wording (Para 5.41) that is contrary to the full definition of settlement requirements within the HoS and critically is contrary to Climate Change policies (both adopted and proposed) and the Sustainability Appraisal objectives.</p> <p>Specifically, para 5.41 of the HoS introduces an element of subjective assessment (proposals that a “larger range” of services and facilities compensate for lack of fundamental criteria (facilities such as fortnightly mobile library visits, children’s playgrounds, outdoor sport facilities &amp; green space cannot possibly compensate in any way for lack of employment and/or public transport)), at odds with aims of the HoS methodology and for addressing the concerns of the SAMDev Examination Inspector in their Report 30th October 2015.</p> <p>The threshold for Community Hub status of 48 points was set by a “3 point gap” in the original 2017 HoS, but this gap never existed. This inaccuracy led to relaxation of the wording, to make the policy fit the results rather than the results meet the policy. Subsequently, the 2018 HoS removed reference to the “3 point gap”, but critically retained the 48 point threshold and the same relaxed wording. Removing the wording does not correct the mistake in setting the threshold at 48 points when full Community Hub criteria is not met by settlements above that score.</p> <p>Also the HoS scoring still contains many inaccuracies (list provided as an appendix to this representation including for Alveley, Baschurch, Bomere Heath, Hodnet, Llanymynech, Pant, Nesscliffe, Whittington, Weston Rhyn/Preesgweene, Cosford, Conover, Dudleston Heath, Knockin, Morda and St Martins, Westbury, Knockin, Brockton, Clive, Cressage, Hodnet, Ditton Priors, Dorrington, Worthen, Prees, Baschurch, Shawbury and Clun), meaning it is unfit for purpose.</p> <p>Para 2.8 of the HoS notes “it is not intended to represent a comprehensive assessment of all services or facilities” this compounds the inaccuracy. This assessment underpins decisions on the status of settlements and therefore it is critical that it is 100% accurate. As it is not, the whole outcome is flawed and unsound.</p>
A0627	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Not Specified	No	Not Specified	<p>No reference is made to Neighbourhood Plans, Community Led Plans or Village Design Statements being considered as part of compliance with draft Policy SP5. This should be included for these documents to be "material considerations" as part of overall siting, site layouts, housing styles, and individual dwelling designs.</p> <p>Note that SP8(i) &amp; SP9(h) refer to Neighbourhood Plans and Community Led Plans, but they do not refer to Village Design Statements which are more likely to be in place for Community Hubs and Clusters and smaller settlements.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0627	B006	<p>1. Amend the Hierarchy of Settlements Assessment (HoS). This assessment must correspond with and support the draft Spatial Vision, draft Policies SP1 and SP3, and Sustainability Objectives SO5, SO6, &amp; SO12 which seek to minimise car travel/maximise trips by sustainable travel and reduce carbon emissions.</p> <p>Para 5.41 of the HoS setting a minimum range of only 5 from 20 services &amp; facilities for a Community Hub settlement is far too low and must be increased.</p> <p>The relaxation wording in para 5.41 of the HoS must also be removed. Rather the full Community Hub criteria set out in Para 1.16 (Table 2) and Para 5.35 (Table 6) must be used to determine Settlement status. Critically, the requirement to have both "significant employment opportunities" and "peak time public transport" for Community Hub status must be met.</p> <p>The Community Hub threshold must be determined by the full Community Hub criteria, not any "gap" that appears in the results, nor by relaxation wording introduced to support inaccurate scoring results i.e. the threshold must be set by the draft Policy and not that the draft Policy be re-written to fit the results.</p> <p>To achieve its stated purpose, the HoS must be an objective assessment and not include any element of subjective assessment.</p> <p>The Table 10 assessment needs to be properly and fully reviewed using on the ground evidence of service &amp; facilities and employment opportunities confirmed locally, not just reliance on the Mint Database information.</p> <p>2. Review the list of proposed Community Hubs to ensure compliance with the full Community Hub criteria and amend settlements development status and proposed allocations accordingly.</p>	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen.</p> <p>Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.</p> <p>As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.</p> <p>Shropshire Council also considers that the development strategy proposed for Trefonen, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p>	No
A0627	B007	<p>Add wording to draft Policy SP5 stating Neighbourhood Plans, Community Led Plans and Village Design Statements are "material considerations" with regard to overall siting, site layouts, housing styles, and individual dwelling designs.</p> <p>Add wording to SP8(i) &amp; SP9(h) to refer to Village Design Statements.</p>	<p>Noted. The explanation to draft Policy SP5 states "Community-led plans can also provide information on locally distinctive design factors, which should be considered in the context of this Policy". Village Design Statements are a form of community-led plan. However, for clarity a minor modification is proposed to the explanation to draft Policy SP5.</p>	Yes

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0627	B008	Sustainability Appraisal	Whole document	Not Specified	No	Not Specified	<p>The whole document is not objective but puts a positive spin on Council aspirations for the Local Plan Review (“highly ambitious” High Growth strategy for both housing and economic growth). Contradictions exist between the identified Sustainability Objectives and application of Policy within the Hierarchy of Settlements Assessment (HoS) and Community Hub designations, which are purported to give significant positive effects on sustainability.</p> <p>Relaxation of key criteria for Community Hub settlements in the HoS (to not require multiple significant employment and peak time public transport) will result in additional private vehicle travel, contrary to the Council’s Climate Emergency Policy, to the National Planning Policy Framework (NPPF), and Government’s Zero Carbon aims. It is also contrary to the proposed “Spatial Vision”, draft Policy SP3 and Sustainability Objectives SO5, SO6, &amp; SO12 which seeks to minimise car travel/maximise trips by sustainable travel and reduce carbon emissions.</p> <p>Table 1.1 Housing Targets: All options proposed at Issues &amp; Options were above the Full Objectively Assessed Housing Need (FOAHN) identified for the county, with additional growth additions of 5%, 10% or 15% respectively. Therefore they all have significant benefits, irrespective of current SAMDev targets. Lower rates might as well not have been included as options if they were never going to be given creditability in the sustainability assessment.</p> <p>Table 1.2 ‘Poor’ sites: Numerous sites assessed as ‘Poor’ appear to have been selected to be allocated for development. That makes no sense.</p> <p>Table 2.7: No assessment of employment opportunities within the Sustainability Assessments for residential sites – are the available in the settlement? how far from the site? how accessible by sustainable travel (walking, wheeling, cycling or by public transport at times when they will trade (including shift patterns if applicable))? These are key factors in achieving sustainable development to meet Sustainability Objectives SO2, SO4, SO5, SO6, &amp; SO12 and draft Policy SP3. Road transport is identified as the largest single contributor of CO2 emissions (SO6), so development should be focused to accessible locations, reducing vehicle use.</p> <p>Table 2.7 Services assessment: Footnote states the list of services is consistent with the Primary Services in the HoS, but this is incorrect. Table 2.7 does not assess Nursery, Convenience Store, Post Office or Petrol Station which are considered “essential for day-to-day life”, whilst including many Secondary items that are “nice to have but not essential”. Access to all the Primary services is fundamental to sustainability.</p> <p>Table 2.8: Peak time public transport provision is included in Table 2.7 but not in Table 2.8. This should be a key factor in assessing and comparing sites.</p> <p>Draft Policy DP3: This draft policy does not itself “reduce the need for people to travel by car”, that is purely determined by the siting of the Open Market development that it forms part of and that being accessible by sustainable travel. If sites or settlements do not have that provision then all residents will have to use cars, potentially impacting more on lower income households, and on the environment.</p> <p>Draft Policy DP4: This draft policy does not itself “allow for a reduction in the need for private car use” It may not increase the need if every one of the new residents uses the other options. Also the requirement is only to access “local services” which in a rural settlement might not include many secondary services or, crucially employment. If settlements or sites do not have that provision then all residents will have to use cars, potentially impacting more on lower income households, and on the environment.</p> <p>Whilst minimal harm to landscape character and historic feature is noted for urban settings, the impact to rural settlements from these developments is not specifically considered, and the likely impact is played down to suit. DP5 Entry Level Exceptions includes consideration of this fact.</p> <p>Draft Policy DP6: Only reference is to urban settings with no mention of locations in or adjacent to rural settlements where impacts will be greater</p> <p>Draft Policy DP7: This completely overlooks developments adjacent to rural settlements. These do not have the “best access to services and facilities in the county” It cannot be said that they “naturally” reduce the need for travel by car, or that they “encourage” sustainable travel. Draft Policy DP7 only requires access to local service and facilities, but makes no mention of accessibility to employment opportunities. If settlements or sites do not have work opportunities then all residents will have to use cars, which potentially impacts more on lower income households, and on the environment.</p>
A0627	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and S14.2	Not Specified	No	Not Specified	<p>Trefonen does not have any “significant employment opportunities” or “peak time public transport”. It is the only proposed Community Hub settlement with neither of these key requirements.</p> <p>Allocating Trefonen as a Community Hub is contrary to draft Policy SP3 and Sustainability Objectives SO5, SO6, &amp; SO12 which seek to minimise car travel/maximise trips by sustainable travel and reduce carbon emissions. Housing provision required to meet “identified local needs” for truly “Affordable Homes” for local people ascertained by application to Home Point Housing Waiting List or by Right Homes Right Places or local Housing Needs Survey during the period of the Plan can be met by draft Rural Affordable Exceptions Policies DP4 – DP7 – and contribute as ‘Windfall’ to the overall Housing Target.</p> <p>Very concerned that multiple “small” developments to reach the currently proposed “guideline” of 50 additional dwellings would have a cumulative impact amounting to the same, or arguably greater, impact as a large development on our village over the course of time. Do not believe that is the intention of the National Planning Policy Framework (NPPF) in allowing Rural Exception developments in and around rural settlements.</p> <p>Appendix to this representation includes a landscape and heritage assessment for Trefonen.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0627	B008	<p>1) Review of the overall Housing Target figure against full assessed needs and additional sustainable growth – amend SP2 and associated housing allocations.</p> <p>2) The Hierarchy of Settlements must be amended.</p> <p>It must correspond with and support SP3 Climate Change and Sustainability Objectives SO5, SO6, &amp; SO12 which seek to minimise car travel and maximise trips by sustainable travel, and to reduce carbon emissions.</p> <p>In Para 5.41 setting a minimum range of only 5 from 20 services &amp; facilities for a Hub settlement is patently far too low and must be increased.</p> <p>In Para 5.41 the relaxation wording must be removed Remove “In circumstances where there is no regular public transport service; and/or high speed broadband; and/or multiple significant employment opportunities, a larger range of services and facilities would be necessary to compensate to enable a settlement to achieve the specified point’s threshold.</p> <p>The full Hub criteria set out in Para 1.16 Table 2 and Para 5.35 Table 6 must be used to determine Settlement status. Critically the requirement to have both “significant employment opportunities” and “peak time public transport” for Hub status must be met. To achieve its stated purpose, the HofS must be an objective assessment and not include any element of subjective assessment.</p> <p>The Settlement Threshold must be determined by the full Hub criteria, not by any “gap” that appears in the results, nor by any relaxation wording introduced to support inaccurate scoring results i.e. the Threshold must be set by the policy and not that the policy be re-written to fit the results.</p> <p>The Table 10 assessment needs to be properly and fully reviewed using on the ground evidence of service &amp; facilities and employment opportunities confirmed locally, not just reliance on the Mint Database information.</p> <p>3) The list of Settlements must then be reviewed to confirm compliance with the full Hub criteria,</p> <p>4) The Draft Plan settlement development status &amp; allocations amended accordingly</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment, used to identify proposed Community Hubs, is appropriate and has been applied consistently across Shropshire. It is also considered consistent with the Sustainability Appraisal objectives. The list of proposed Community Hubs is also considered appropriate.</p> <p>Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.</p> <p>The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.</p>	No
A0627	B009	<p>Trefonen should be designated 'other rural settlement', with no housing guideline (development can come forward to meet identified local needs for truly affordable housing under draft Policies DP4, DP5 and DP7). Appropriate updates made to the draft Shropshire Local Plan.</p> <p>Limitations on cumulative “Exception Site” developments adjacent to individual settlements must be included within policies DP4, DP5, &amp; DP7.</p>	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Trefonen. As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.</p> <p>Shropshire Council also considers that the development strategy proposed for Trefonen, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable. Notably there are no housing allocations in the settlement within the draft Shropshire Local Plan. A minor modification is proposed to reduce the gross housing requirement for the village over the plan period (see response to A0605)</p> <p>As specified within draft Policies DP4, DP5 and DP7 the primary factor that determines the size threshold for affordable housing exception sites is local need (with DP7 also specifying schemes will not normally exceed 10 dwellings). However, they also include a cross-reference to para 4(a-d) of draft Policy SP9, which identify considerations for developments including scale, design and layout of development (in the context of the site and its surroundings) and infrastructure capacity. It is considered that this effectively manages cumulative impact.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0628	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16	No	No	Yes	<p>The draft Shropshire Local Plan recognises Shrewsbury as the Strategic Centre of Shropshire and the primary focus for new development in the County. Support this approach and the aspiration for 8,625 dwellings to be delivered in and around the town across the plan period. Shrewsbury West Sustainable Urban Extension (SUE) has a hybrid outline permission for development of 296 residential units and other uses. There is currently a new full application pending consideration for 340 residential units and associated on the site (to make the best possible use of the land and increase the number of houses, helping to contribute to tackling housing need in Shropshire).</p> <p>The new full application represents 340 of the 750 homes expected to be delivered as part of the Shrewsbury West SUE (around 46%), including providing 51 affordable units, and setting a high standard for development of future parcels of land within the SUE allocation.</p> <p>As well as the material benefits of new homes and a new community, the new permission will be supported by numerous contributions made through a S.106 agreement - based upon the Heads of Terms of the extant hybrid outline permission (summarised in the representation). Intention is to deliver homes in a timely manner, in line with Shropshire's housing trajectory.</p> <p>Shrewsbury West SUE is included as a saved policy in the draft Shropshire Local Plan. However, it has not been designated its own policy with the draft Shropshire Local Plan. Consider that as part of draft Policy S16, the Shrewsbury West SUE should be discussed and benefits highlighted. This will ensure a coordinated approach for the Shrewsbury area, as suggested in para 5.222 of the explanation to draft Policy S16.1. The full application also demonstrates it may be possible for Shrewsbury West SUE to accommodate more houses than previously allocated, this should be explored.</p> <p>Consider illustration of the Shrewsbury West SUE on the draft Policies map could be improved - more clear and precise. Reference should also be made to the adopted Shrewsbury West Masterplan. Rather than multiple sub-divided maps the Draft Shropshire Local Plan could provide a single map showing the whole of the Shrewsbury area and the spatial strategy for future development, helpful for the purposes of understanding and coordination.</p> <p>Support the proposed approach to the Shrewsbury North West Relief Road (NWRR), but recommend detailed reference to the Shrewsbury West SUE is made in this context, as they are directly linked. The NWRR should also be framed as part of a wider spatial approach for the Shrewsbury area, highlighting its importance.</p>
A0628	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	No	No	Yes	<p>Para 3 of draft Policy DP1 states "all affordable dwellings will achieve the nationally described space standard. All open market dwellings are strongly encouraged to comply with the nationally described space standard". Object to this as a requirement for open market residential units. Footnote 46 of the National Planning Policy Framework (NPPF) requires justification for application of nationally described space standards, consider the evidence provided (over-crowding) is insufficient.</p> <p>Parts of the draft Policy could inadvertently undermine delivery of much needed affordable housing. For instance requirements for minimum floor to ceiling heights would likely increase costs and is unjustified. This can be discussed during the Planning Application process and appropriate flexibility provided to meet differing needs/aspirations.</p> <p>Requirements relating to Nationally Described Space Standards (NDSS) are not justified and given potential to lead to viability issues and reduced delivery of affordable housing, these elements of draft Policy DP1 should, without further evidence, be removed or re-worded to advise the use of the NDSS rather than demand it.</p>
A0628	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP15	No	No	Yes	<p>In draft Policy DP15 support proposed notion of 'quality over quantity', when it comes to open space. However, concerned by the specific 30sqm per person figure which is set out in part 2 of the draft Policy.</p> <p>Consider this approach is unjustified. The 30sqm per person figure seems to be chosen at random with no evidence provided as to how it has been calculated or come to. There is also no evidence the provision of open space is an issue in Shropshire (there are a range of parks and open countryside that residents will be able to take advantage of).</p> <p>Open space which is shared should not be calculated on the same basis as an individual garden. Shared open space, of say a block of flats, would be used by multiple residents of different flats, whereas a garden would be private to only that house. If the council can evidence that there is a need for a specific figure of open space per person then request a lower figure is designated per person when it comes to shared open space.</p> <p>Furthermore, request the policy takes a view that all open space should first and foremost be design-led, informed by the character and context of the development proposed. Shropshire should use flexibility in its approach towards open space, and judge each site's provision on a case-by-case basis.</p>
A0628	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	No	No	Yes	<p>Support draft Policy DP2 as only an encouragement rather than a requirement for provision of self-build and custom-build development, but disagree with the sentiment that such a policy justified.</p> <p>There is no evidence that self-build homes are desired by residents who live within development sites. Also self-build homes are more commonly found on individual plots and not within development sites.</p> <p>Consider draft Policy DP2's encouragement for development of self-build houses on sites larger than 0.5 ha could be problematic for several reasons. If the self-build house is designed in such a way that it is not in keeping with the general vernacular of the rest of the site then it will be noticeably out of character; unsuitable and jarring for residents. If the design of the self-build is similar to the other homes on the site, then the development of the self-build home is aesthetically open to debate, as it is for all intents and purposes the same as the houses, with the only difference being it was erected by an independent construction team. The construction of a self-build house is likely to be slower than the construction of houses which are being developed by a housebuilder who is carrying out works with a consortium of specialised workmen who have a wealth of experience erecting similar homes.</p> <p>This approach is neither justified, sensible or practical. Recommend removal of section 2 of draft Policy DP2.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0628	B001	<p>As part of draft Policy S16, the Shrewsbury West SUE should be discussed and benefits highlighted. The potential for the site to accommodate more development should also be explored.</p> <p>Improve graphics on the proposed Policies Map and provide a comprehensive map showing the whole of the Shrewsbury area and the spatial strategy for future development.</p> <p>The North West Relief Road (NWRR) should be framed as part of a wider spatial approach for the Shrewsbury area, highlighting its importance.</p>	<p>Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.</p> <p>Shrewsbury West Sustainable Urban Extension (SUE) is a proposed saved allocation. Development of proposed saved allocations should be in accordance with specified development guidelines and approximate site provision figures within associated saved policies and all other relevant policies of the draft Shropshire Local Plan.</p> <p>Shropshire Council also considers that the draft Policies Map effectively illustrates the spatial aspect of draft policies. We would note that alongside the PDF versions of the maps (extents informed by file sizes and maximum print sizes) an interactive version of the policies map, which covers the entirety of Shropshire is available.</p> <p>References to the North West Relief Road (NWRR) are considered appropriate. The overall spatial strategy for Shropshire is not predicated on the delivery of the NWRR, although it is appropriate to identify the proposed route of the NWRR on the Policies Map.</p>	No
A0628	B002	<p>Requirements relating to Nationally Described Space Standards (NDSS) are not justified and given potential to lead to viability issues and reduce delivery of affordable housing, these elements of draft Policy DP1 should be removed or re-worded to advise the use of the NDSS rather than demand it.</p>	<p>Noted. The approach to nationally described space standards proposed within Para 3 of draft Policy DP1 is considered to positively respond to the evidence available within the Strategic Housing Market Assessment (SHMA) and other sources. Providing dwellings with sufficient internal floorspace positively contributes to the future occupier's ability to achieve a high-quality of life and is responsive to changing household requirements, by increasing the ability to include adaptations at a later date.</p>	No
A0628	B003	<p>Reduce the open space per person required in draft Policy DP15. The draft Policy should take the view that all open space should first and foremost be design-led, informed by the character and context of the development proposed, judging each site's provision on a case-by-case basis.</p>	<p>The Council considers that this policy approach provides consistency and certainty to developers and notes that Draft Policy DP15 provides appropriate flexibility in instances where the development is able to provide a particularly high quality of open space on site which meets the needs of all residents. No change proposed</p>	No
A0628	B004	<p>Recommend removal of section 2 of draft Policy DP2.</p>	<p>Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. The needs of self-build and custom-build developers are diverse and as such providing a range of appropriate plot opportunities is considered the most effective means of meeting these needs. Encouraging the provision of 10% of plots on sites above specified thresholds, particularly where there is an identified need on the Self-Build Register, reflects this position.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0628	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	No	No	Yes	Support that draft Policy DP11 does not exceed 2013 building regulations, but it should be noted these regulations are not permanent. For example, consultation occurred on The 'Future Homes Standard' - Part L of the Building Regulations in Feb 2020 (targeted for publication by 2025 so unlikely to have any bearing on draft Policies in the draft Shropshire Local Plan). The 'Future Homes Standard' consultation noted energy performance requirements increase the costs for home builders and proposes to remove the ability of local authorities to set higher energy efficiency standards than those in the Building Regulations. Important that Shropshire ensure that local policy aligns with national guidance. Draft Policy DP11 requires 10% of renewable energy to be generated from on-site renewable and low carbon energy technologies. The cost of this can significantly impact on viability making it unworkable for some developments. The draft Shropshire Local Plan does state these measures can be avoided by demonstrating via "open book accounting" that they would make development unviable. Support this clause but submit that it would be helpful if further guidance was given with regard to the relationship between affordable housing, climate change measures and viability; namely which matter should be prioritised within viability assessments.
A0628	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3-DP7	No	No	Yes	Generally support proposed approach towards affordable housing. Urge the Council to take notice of the potential for open-book viability assessments to be used for determining the provision of affordable housing expected within developments. Shrewsbury South Sustainable Urban Extension underwent detailed assessment with regard to affordable housing and it was subsequently found the site could only provide 15% (rather than 20%). This approach was effective in ensuring that the scheme provided affordable housing whilst also being viable. It would be proactive of the Council to include reference to Viability Assessments.
A0628	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	No	No	Yes	References to district heating and cooling and community energy generation and distribution schemes in draft Policy SP3 are vague and could lead to issues of what is expected of development. Further justification for this draft Policy is necessary to make the approach sound. Recommend further clarity on what these schemes would entail. It may be necessary for the Council to produce separate guidelines specifically on this matter. There is no draft Policy relating to the number of electric vehicle charging points expected within developments. It would be helpful if the expectations for charging points was more clearly set out, with reference to the impacts of viability being taken into consideration.
A0628	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	No	No	Yes	The draft Shropshire Local Plan omits a detailed housing trajectory and is therefore inconsistent with the National Planning Policy Framework.
A0629	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole document	Yes	No	Yes	The Planning and Compulsory Purchase Act (section 19) and the NPPF (para 148 – 149, incorporating footnote 48 and supplemented by NPPG), require Local Plans to be carbon audited and contribute to radical carbon emission reductions in line with the Climate Change Act. Legal briefing by the RTPI is supported, this states Local Plans are required to take into account baseline emissions; robustly evaluate future emissions, considering different emission sources, taking into account requirements set in national legislation, and a range of development scenarios; adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act, a 100% reduction by 2050. The draft Shropshire Local Plan sets out no carbon budget. References to reducing carbon emissions are general rather than objectively measurable as required. Therefore, given the RTPI legal opinion, the draft Shropshire Local Plan is not sound in terms of its climate change mitigation policies and duties. The evidence base for the draft Shropshire Local Plan should provide an overall carbon budget for the County to 2050, consistent with the updated Climate Change Act, showing baseline emissions and impact of development and mitigating policies on the emissions curve. Policies should aim to secure radical carbon reductions in line with a trajectory for the authority area that is consistent with the UK achieving full carbon neutrality by 2050, and in the short term should test the policy options available to achieve the highest level of ambition possible to meet this goal. To the extent possible, all new development should be zero carbon given that the country's net zero target must be met in the next 30 years. This additional step should help the council align its local plan with its climate emergency declaration, and provide evidence to support the development and adoption of stronger planning policies. Where local authorities have undertaken carbon auditing, it is often concluded that it would be very difficult to achieve the required carbon reduction trajectory without new development being developed to a zero-carbon standard, due to the additional emissions growth inherent in new development commitments. Thus, following the process set out in legislation, planning policy and guidance to the letter will support the need for very ambitious planning policies around building performance. Such an approach also provides evidence to support proactive and supportive renewable energy policies as essential to carbon emission reduction.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0628	B005	Ensure that draft Policy DP11 aligns with national guidance and recognises Building Regulations are not permanent. Provide further guidance on the relationship between affordable housing, climate change measures and viability - which matter should be prioritised within viability assessments.	Although the government announced its intention to amend Subsection 1 (c) of the 2008 Planning and Energy Act in 2015 - which states that Local Planning Authorities may include policies imposing reasonable requirements for 'development in their area to comply with energy efficiency standards that exceed the energy requirements of the building regulations' - these amendments have not yet been enacted. The intention of the amendment was to introduce higher energy performance requirements through building regulations, rather than the planning system. The performance increase was expected to be a 19% improvement. This improvement is also referenced in national policy through the 2015 Written Ministerial Statement - being equivalent to the Code for Sustainable Homes level 4 energy criteria which the Statement permits. However, the government's 2015 Productivity Plan subsequently stated that 'the government does not intend to proceed with .....the proposed increase in on-site energy efficiency standards, but will keep energy efficiency standards under review recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.' Recent government consultations on the Future Homes Standard and Future Buildings Standard indicate that such a review is ongoing with the outcome forming part of changes to Part L of the Building Regulations. However, these changes have not yet been made. Thus the Council believes that the powers afforded to LPAs through the 2008 Planning and Energy Act to set energy efficiency standards in new homes still exist and that this policy's requirements are appropriate. Provision is also made in the policy for higher Building Regulations standards to apply if/when these are implemented. No change proposed.	No
A0628	B006	Include reference to Viability Assessments within draft affordable housing policies	Noted, para 2 of Draft Policy DP3 states "The provision of reduced rates of affordable housing due to viability concerns on otherwise sustainable schemes will be considered in exceptional circumstances where evidence is clearly presented and agreed by the Council. In these circumstances an overage clause will be sought in order to secure the potential for future contributions towards affordable housing."	No
A0628	B007	Provide further justification and explanation for draft Policy SP3.	Shropshire Council considers that draft Policy SP3 provides an appropriate mechanism to support the transition to a zero-carbon economy and there is sufficient justification within it and associated detailed policies with regard to the proposed requirements of this policy. A Whole Plan Viability Assessment has been undertaken to inform policy requirements with the intention of ensuring the draft Shropshire Local Plan is viable and deliverable. The provision of electric vehicle infrastructure is covered by Building Regulations rather than the planning system.	No
A0628	B008	Provide a detailed housing trajectory.	As outlined within the proposed explanation for draft Policy SP2 "the expected rate of housing delivery over the Local Plan period is around 1,400 dwelling per annum, which is consistent with the annual housing requirement. Whilst it is acknowledged that there will inevitably be fluctuations over time, which may result in annual rates of delivery falling below or exceeding this level, it is expected that this will 'balance out' to ensure that the housing requirement is achieved. As such it is considered that this expected rate of delivery over the Local Plan period of around 1,400 dwellings per annum forms the most robust trajectory of future housing delivery in Shropshire and will be used to assess annual housing delivery."	No
A0629	B001	The draft Shropshire Local Plan should be subject to a carbon audit. To the extent that this indicates that the draft Shropshire Local Plan may not be following the trajectory to zero carbon, it should be modified and resubmitted.	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0629	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Yes	No	Yes	Draft Policy DP11 is not sound because it will not achieve stated carbon emission reduction objectives. Amendments are proposed to enable the Policies of the council overall to achieve stated objectives in terms of the carbon performance of developments. Evidence will be presented that demonstrates the Council is able to make its policies sound by the proposed amendments.
A0629	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Yes	No	Yes	The ecological emergency and loss of nature is as significant as climate change, and the importance of this is not recognised by the policy and the plan overall. The natural environment keeps us alive and is vital to people's health and wellbeing as well as supporting the economy. Development needs to support nature recovery, not just 'avoid harm' as draft Policy DP12 says.
A0629	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23 and SP5	Yes	No	Yes	Clause 1(g) draft Policy SP3 promotes fabric energy efficiency retrofits of existing buildings, yet no support is given for responsible energy retrofitting of historic and listed buildings within draft Policy DP23. Shropshire has a large stock of poorly insulated buildings. In meeting the Council's climate emergency declaration, reducing carbon emissions from existing building stock is at least as significant as ensuring new development is zero carbon. Draft Policy DP23 should be amended to reflect this. Consider potential for preparation of supplementary planning guidance setting out how homeowners could improve the energy efficiency of their own homes without detracting from their heritage significance.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0629	B002	<p>Series of additional requirements proposed for addition to draft Policy DP11 (documented within representation).</p> <p>These include a section on energy use in new development, stipulating development will be expected to minimise demand for heating, cooling, hot water, lighting and power through energy efficiency measures; then meet its remaining heat/cooling demand sustainably; then maximise on-site renewable energy generation; and then meet any outstanding reduction in residual emissions through carbon offsetting.</p> <p>Development will be expected to achieve a minimum 10% reduction in regulated CO2 emissions through energy efficiency measures; and a minimum 35% reduction in regulated CO2 emissions through a combination of energy efficiency measures and on-site renewable energy generation. After applying on site measures, development is expected to achieve a 100% reduction in remaining regulated and unregulated emissions through use of carbon offsetting.</p> <p>The policy should also require new development to demonstrate through an Energy Strategy set out as part of its Sustainability Statement how these requirements will be met. Where existing buildings are being converted into new uses and it is not feasible for the full CO2 emission reduction to be met, the Energy Strategy should show that energy demand has been reduced to the lowest practical level using energy efficiency measures, heating/cooling systems have been selected sustainably and that on-site renewable energy will be installed where feasible, aiming for a 20% reduction in regulated CO2 emissions on site and exceeding this whenever possible.</p> <p>The policy should also include a section on carbon offsetting stating once on-site CO2 reduction requirements for energy efficiency and renewable energy measures have been met, the remaining emission reductions will be met by carbon offsetting measures such as providing the residual emission reduction through a financial contribution to renewable energy, low-carbon energy and energy efficiency schemes elsewhere in the Shropshire area; or agreeing acceptable directly linked or near-site provision. The financial contribution required will be equivalent to the cost of mitigating the residual CO2 emissions off-site, at a rate of £95 per tonne of CO2 that would be emitted over a period of 30 years.</p> <p><u>The policy should also include a section on PassivHaus buildings, stating where buildings</u></p>	<p>The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed</p>	No
A0629	B003	<p>The ecological emergency and loss of nature is as significant as climate change, and the importance of this is not recognised by the policy and the plan overall. The natural environment keeps us alive and is vital to people's health and wellbeing as well as supporting the economy. Development needs to support nature recovery, not just 'avoid harm' as draft Policy DP12 says.</p>	<p>The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed</p>	No
A0629	B004	<p>Draft Policy DP23 should be amended to reflect para 1g of draft Policy SP3 by including the following additional paragraph:</p> <p>The Council will seek to encourage and enable the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings (including listed buildings and buildings of solid wall or traditional construction) and in conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future. Proposals will be considered against national planning policy framework.</p> <p>Consider potential for preparation of supplementary planning guidance setting out how homeowners could improve the energy efficiency of their own homes without detracting from their heritage significance.</p>	<p>Proposals for the retrofitting of energy efficiency measures and for the installation of renewable energy systems on or affecting heritage assets would be assessed against this policy as and when they come forward. The Council does not consider it necessary to encourage such proposals and as such does not propose any changes to the policy.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0629	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP26	Yes	No	Yes	<p>Draft Policy DP26 is unsound. Whilst it mentions a wide range of forms of renewable energy, it just lists potential negative impacts, rather than providing a positive strategy which maximises potential for renewable energy development, as required by para 15 of the National Planning Policy Framework (NPPF). It also fails to achieve the intended low carbon transition, zero carbon Shropshire objectives (net zero carbon by 2030) and Government's minimum objectives for renewables set out in national policy/legislation (zero carbon by 2050 if not sooner). To achieve this and decarbonise heat and transport renewable energy generation must quadruple from current levels to meet demand.</p> <p>Shropshire Council is currently supporting mapping of the deployable renewable energy resources across the region and will develop more detailed policies identifying these (with maps identifying potentially suitable areas for development), with clear criteria for the assessment of planning applications, and encouragement for developers to take up these significant opportunities for the development of the Shropshire economy and self-sufficiency in energy by 2030. Shropshire Council is also giving specific encouragement to community energy projects, as suggested by para 152 of the NPPF.</p> <p>The policy needs to match Shropshire Council intentions by reference to the positive contribution of renewable energy to meeting carbon reduction commitments and to the potential benefits of renewable energy in terms of economic development.</p>
A0629	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP28	No	No	Yes	<p>Draft Policy DP28 is not sound or legally complaint because it does not comply with government policy and will not achieve stated Council objectives for net zero carbon Shropshire by 2030, or the longer term objectives of the Climate Change Act (2008).</p> <p>The draft Policy has clearly not been informed by Governments proposals for de-carbonising transport, reducing car trips/promoting active travel and EV charging infrastructure is set out in 'Decarbonising Transport'; aspirations for increased cycling in 'Gear Change' and Local Transport Note 1/20 or RTPI advice to set ambitious requirements for trip reduction, mode share targets and 'zero carbon' outcomes; prioritise urban renewal that enables growth while reducing travel demand; maximise the potential for local living so people can meet their needs by walking and cycling; and all new development to be located and designed to generate zero transport emissions.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0629	B005	<p>Draft Policy DP26 should be completely re-written as follows:</p> <p>Decentralised renewable and low carbon energy schemes will be supported and encouraged, and will be approved where their impact is, or can be made, acceptable. In determining applications for renewable and low carbon energy, and associated infrastructure, the following issues will be considered:</p> <p>a) the contribution of the proposals, in the light of the Council's pledge to be net zero carbon by 2030, to cutting greenhouse gas emissions and decarbonising our energy system.</p> <p>b) the impact of the scheme, together with any cumulative issues, on landscape character, visual amenity, water quality and flood risk, heritage significance, recreation, biodiversity and, where appropriate, agricultural land use, aviation and telecommunications.</p> <p>c) the impact on users and residents of the local area, including where relevant, shadow flicker, air quality, vibration and noise.</p> <p>d) the direct benefits to the area and local community.</p> <p>Ground-mounted solar energy developments are more likely to be supported in areas identified as suitable in principle as set out on the maps currently under development on behalf of the council and their partners in Shropshire Climate Action Partnership. Outside these areas, applicants will need to provide a clear justification for the suitability of the chosen development site for solar development at the relevant scale. Proposals for renewable energy proposals within the AONB will be encouraged, however, where development proposals will affect the AONB, the benefits of development must demonstrably outweigh any harm to the designated area or its setting.</p> <p>Additionally, proposals for wind energy development:</p> <p>a) should be located within a suitable area as indicated on the Policies Map;</p> <p>b) are more likely to be supported if they fall within Landscape Character Areas of lower sensitivity to the relevant development scale;</p> <p>c) may also be suitable in principle if they are located in large new development sites, existing industrial estates or if they are proposed in neighbourhood plans or through <u>community energy schemes</u>; and</p>	<p>The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed</p>	No
A0629	B006	<p>Amend highway policies to reflect the shift in priority from car to cycling and walking, and where suitable seek introduction of low traffic neighbourhoods across Shropshire's towns and villages.</p> <p>-Require major development to incorporate/fund provision of high quality segregated cycle routes and direct and safe pedestrian infrastructure, commensurate with the scale of development and trip generation.</p> <p>-Across the existing highways network a priority and suitable ringfenced budget will be given to modifications to highways to incorporate suitable cycle infrastructure and incorporate measures such as default 20mph speed limits in urban areas to reduce road hazard and encourage cycling and walking.</p> <p>-Specify all infrastructure for cycling routes will be designed in accordance with Local Transport Note 1 / 20 - Cycle Infrastructure Design. Cycling is or will become mass transit and must be treated as such.</p>	<p>The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. Policy DP28 recognises that a sustainable transportation system for Shropshire must include a range of transport networks and services and present a range of travel options to individuals, households, organisations and businesses. Policy DP28 constructs the transportation system into a hierarchy to promote sustainable choices by informing and encouraging those travelling or transporting goods to choose sustainable transport options to meet their needs. Although this hierarchy includes modes of transport considered to be unsustainable, these options are still part of the transportation system and may be the best or only means by which to travel or transport goods over long distances or to access less well connected places. To address limitations to achieving modal shifts in a rural County like Shropshire the Local Plan strategy is structured around the strategic transport corridors through the County and seeks to achieve a higher level of urban development. Policy DP28 also recognises the need for more sustainable choices in looking towards the delivery of new travel and transport options and advocates the Hierarchy of Sustainable Transport as a simple decision pathway for everyone to follow in making their choices about travel and transport and by encouraging everyone to consider how they can contribute to reversing adverse changes to our environment.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0629	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	<p>Welcome inclusion of a specific Climate Change policy but needs to be much stronger &amp; should be named 'Climate Emergency'. Paras 1a-g in SP3 are at variance with other statements &amp; established policies and track record of Shropshire Council that damage public transport and active travel including: rejection of default 20mph zones (at Council in Dec 2019) despite evidence re the effectiveness in increasing walking and cycling and reducing transport's carbon emissions; reductions in bus funding ; demolition of Shrewsbury bus station contrary to the central principle of sustainable transport which is integration, achieved by close location of train &amp; bus stations to encourage bus and train use in combination and this combination; refusal to develop a Cycling and Walking Infrastructure Plan. Statements in SP3 at variance with Shropshire Council neglect and damage to walking, cycling and public transport and nothing in the Local Plan that demonstrates a reversal of these policies.</p> <p>Re para 1 a Local Plan does not give substance to the aspiration of "maximising the ability to make trips by sustainable modes of transport" which requires interventions e.g. those available under Bus Services Act (2017) ( such as those used by Cornwall County Council's bus strategy) to produce substantial increases in walking, cycling and bus use &amp; and there is nothing in the Local Plan to indicate that this will be done in the plan period. The text makes nothing compulsory but and the words 'encourage' and 'where possible' and 'promoting' are meaningless unless enforceable and enforced.</p> <p>Policy aspirations call into question traffic figures used in the outline business plan for the proposed Shrewsbury North West Relief Road. These need review in the light of the COVID pandemic and the climate emergency.</p> <p>Para 3.31 The Strategy framework is not a strategy but an outline of how the strategy will be developed. The Local Plan needs to reference the council's Climate Change Strategy or more appropriately, as this document only refers to Shropshire Council's emissions, the Zero Carbon Shropshire Plan produced through the Shropshire Climate Action Partnership of which Shropshire Council is a contributor. This addresses the totality of direct and indirect emissions &amp; in the absence of an up to date transport plan could provide some of the headline figures of how transport (and by implication spatial planning) needs to change. The implications of this policy have not been followed through into the traffic forecasts that are used in the outline business case for the NWRR. Support for active travel ( para 1d ) is not linked to adoption of EVs or ULEVs. Driving a car is a sedentary activity &amp; car ownership increases car use and reduces walking, cycling and bus use. If people drive rather than walking or cycling, they do not meet public health targets for physical activity with resulting elevated disease risk. The local plan includes nothing to stimulate or promote non-car alternatives including infrastructure to support walk, cycle and bus use such as: excellent segregated cycle paths, joined-up networks to link housing with schools / commonly used destinations. These requirements are not supported or funded in Shropshire&amp; there has been a refusal by Shropshire Council to adopt 20mph contrary to WHO advice in the Stockholm declaration that this increases active travel and modal shift away from cars and towards walking, cycling and bus use. It highlights that appropriate speed management to address environmental &amp; safety issues is important.</p> <p>Wholesale adoption of Electric vehicles on its own, without significant traffic reduction, is not enough to meet net zero targets &amp; the significance of transport and climate change is a major weakness of the climate change sections of the Local Plan as highlighted in the recent Lyn Sloman report for at Transport for Quality of Life.</p> <p>A completely new section should be included in the Local Plan explaining why we must reduce traffic levels (e.g. a 25% reduction in vehicle kms travelled in Shropshire). This is well understood and be found in UK government reports but is not mentioned in the Local Plan.</p>
A0629	B007 - 31	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-1	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	<p>Active and sustainable solutions to the town's transport challenges are the only effective ways to reduce congestion, poor air quality and road deaths/injuries &amp; better lives. As described in the RTPI report (Net Zero Transport: the role of spatial planning and place-based solutions, Jan 2021), spatial planning and the transport systems need to be considered together to create pathway to net zero greenhouse gas emissions. Given national &amp; local climate emergency declarations needs to be a central component of this Local Plan. The RTPI, 2021 identifies that the planning system should prioritise urban renewal that enables growth while achieving a substantial reduction in travel demand &amp; indicates that this should focus on maximising the potential for local living ( by ensuring access to a wide range of services &amp; facilities by walking and cycling) with a key role for increased flexible &amp;home working, digital service delivery &amp; community spaces, alongside investment in place. The draft Local Plan fails to ensure that key planning decisions during its life will contribute to the pathway to achieving net zero. The recent Environmental Audit Committee report on Greening the Post COVID Recovery identifies Covid 19 crisis as a symptom of a growing ecological emergency highlights the urgency of tackling climate change as part of economic recovery. Particular issue with respect to the interaction of spatial planning and transport as Shropshire Council has failed to update its Local Transport Plan in time to inform the draft Local Plan.</p> <p>Spatial Vision' in Para 2.31 of the draft plan has admirable objectives but vision will not be delivered. Submission details against each policy how vision will not be achieved.</p>
A0629	B007-10	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	There should be reference to addressing business carbon emissions in the policy .
A0629	B007-11	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	Renewable energy is mentioned in the opening paras but there is no consideration in the plan of how much is required or how this might be achieved.SP10 5(d) Investment should be prioritised for sustainable transport in appropriate locations, in line with DfT guidance on a hierarchy of road users as road transport is a major contributor to the Climate Emergency.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0629	B007	<p>See issues summary . Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed .Modify policy to reflect comments;</p> <p>The following specific modifications identified:</p> <ol style="list-style-type: none"> <li>1. Welcome specific Climate Policy but needs to be much stronger &amp; be re- named 'Climate emergency'</li> <li>2. para 1.e. Weak wording, change “encourage” to “ensure”. A site should not be on the list unless it can be linked and integrated and unless it is a condition for development.</li> <li>3. para 1.f. The wording is weak as electric charging infrastructure should be provided in all new development.</li> <li>4 para 1.g. Fabric energy efficiency should be defined with a minimum figure.</li> <li>5. The local plan needs to do more to achieve traffic reduction and to stimulate or promote non-car alternatives e.g. appropriate infrastructure provision &amp; speed management (20mph speed limit);</li> <li>6 para 3.31 needs to reference the Council’s Climate Change Strategy or more appropriately, the Zero Carbon Shropshire Plan</li> <li>7 new section should be included in the Local Plan explaining why we must reduce traffic levels (e.g. a 25% reduction in vehicle kms travelled in Shropshire).</li> <li>8 Include greater reference to 25 Year Environment Plan</li> </ol>	<ol style="list-style-type: none"> <li>1. The name of draft Policy SP3 is considered to appropriately reflect its subject matter.</li> <li>2. The proposed change would impose an unreasonable requirement given that the rural nature of Shropshire means that not all new development will be able to link to or integrate with public transport.</li> <li>3. The provision of electric vehicle infrastructure is covered by Building Regulations rather than the planning system.</li> <li>4. Energy efficiency ratings are covered by Building Regulations and it is not considered necessary to refer to specific figures in this policy</li> <li>5 and 7. The need to reduce traffic and encourage alternative travel options is a theme running throughout the Plan. There is an emphasis on the location of new development in existing urban centres, the wording of many policies supports pedestrian and cycling options and the Sustainability Appraisal and site assessment process contain criteria aimed at minimising car-based travel and encouraging walking and cycling.</li> <li>6. The Council’s Climate Change Strategy covers issues which are primarily delivered by mechanisms other than the planning process - although the Local Plan does reflect the Strategy’s priorities when they accord with national planning policy and guidance. Accordingly, it is not considered necessary to reference the document in this paragraph.</li> <li>8. The government’s 25 year Environment Plan covers a wide range of issues and where its provisions affect the planning process, they have been reflected in Shropshire Local Plan policies. However, the Shropshire Local Plan should be read as a whole and the Council</li> </ol>	No
A0629	B007 - 31	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0629	B007-1	No specific modifications identified. Submission details against each policy how vision will not be achieved	<p>Noted. The draft Spatial Vision recognises the importance of and identifies the need to move positively towards a zero-carbon economy. The draft Spatial Vision would be implemented through the draft Policies proposed within the draft Shropshire Local Plan.</p> <p>The Council considers that the approach taken to climate change and reducing carbon emissions throughout the draft Shropshire Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.</p>	No
A0629	B007-10	include reference to addressing business carbon emissions	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0629	B007-11	Needs to set out how much renewable energy is required & how this might be achieved. How many solar or wind farms are likely to be required and where would they be best located within the county; SP10 5(d) Investment should be prioritised for sustainable transport in appropriate locations	Noted. Local Plan has to address a wide range of issues and requirements and is intended to be read as a whole. Therefore, in addition to the criteria set out in Draft Policy SP10, the relevant considerations of all other applicable policies will need to be taken into account in decision making on planning applications. Council considers that the approach taken to renewable energy, climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. The Transport Plan sets out transport investment priorities .	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0629	B007-12	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	No SP14 specific comment
A0629	B007-13	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon. DPs 1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan.
A0629	B007-14	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon. DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan.
A0629	B007-15	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan. There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing Pitch strategy indicates new facilities on new sites are a last resort. Thus, in addition to existing lack of infrastructure for cycling and pedestrians there is also a lack of infrastructure in the design of new facilities including public open spaces for family access.
A0629	B007-16	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan. There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing Pitch strategy indicates new facilities on new sites are a last resort. Thus, in addition to existing lack of infrastructure for cycling and pedestrians there is also a lack of infrastructure in the design of new facilities including public open spaces for family access.
A0629	B007-17	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan. There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing Pitch strategy indicates new facilities on new sites are a last resort. Thus, in addition to existing lack of infrastructure for cycling and pedestrians there is also a lack of infrastructure in the design of new facilities including public open spaces for family access.
A0629	B007-18	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan. There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing Pitch strategy indicates new facilities on new sites are a last resort. Thus, in addition to existing lack of infrastructure for cycling and pedestrians there is also a lack of infrastructure in the design of new facilities including public open spaces for family access.
A0629	B007-19	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan. There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing Pitch strategy indicates new facilities on new sites are a last resort. Thus, in addition to existing lack of infrastructure for cycling and pedestrians there is also a lack of infrastructure in the design of new facilities including public open spaces for family access.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0629	B007-12	Para 3.144 and 3.145 Replace "should" with "must" to make this enforceable	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0629	B007-13	Explicitly identify within the policy how it will assist in achieving net zero carbon. Re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-14	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-15	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period; modify for greater recognition of the need to supply more accessible natural greenspace for affordable housing developments	Noted. Draft Policy DP3. Affordable Housing Provision includes a policy requirement of "Ensuring that affordable housing is appropriately distributed within the site, their locations maximise opportunities for future residents to access services and facilities by walking, cycling or public transport and minimises the exposure of future residents to sources of noise or reduced air quality." Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0629	B007-16	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period; modify for greater recognition of the need to supply more accessible natural greenspace for affordable housing developments	Noted. Draft Policy DP3. Affordable Housing Provision includes a policy requirement of "Ensuring that affordable housing is appropriately distributed within the site, their locations maximise opportunities for future residents to access services and facilities by walking, cycling or public transport and minimises the exposure of future residents to sources of noise or reduced air quality." Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0629	B007-17	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period; modify for greater recognition of the need to supply more accessible natural greenspace for affordable housing developments	Noted. Draft Policy DP3. Affordable Housing Provision includes a policy requirement of "Ensuring that affordable housing is appropriately distributed within the site, their locations maximise opportunities for future residents to access services and facilities by walking, cycling or public transport and minimises the exposure of future residents to sources of noise or reduced air quality." Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.	No
A0629	B007-18	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period; modify for greater recognition of the need to supply more accessible natural greenspace for affordable housing developments	Noted. Draft Policy DP3. Affordable Housing Provision includes a policy requirement of "Ensuring that affordable housing is appropriately distributed within the site, their locations maximise opportunities for future residents to access services and facilities by walking, cycling or public transport and minimises the exposure of future residents to sources of noise or reduced air quality." Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.	No
A0629	B007-19	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period; modify for greater recognition of the need to supply more accessible natural greenspace for affordable housing developments	Noted. Draft Policy DP3. Affordable Housing Provision includes a policy requirement of "Ensuring that affordable housing is appropriately distributed within the site, their locations maximise opportunities for future residents to access services and facilities by walking, cycling or public transport and minimises the exposure of future residents to sources of noise or reduced air quality." Draft Policy DP15. Open Space and Recreation provides standards for open space provision within residential development (including all forms of residential development involving affordable housing), this includes accessible natural greenspace. The Local Plan should be read as a whole The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0629	B007-2	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	<p>Spatial Vision' in Para 2.31 of the draft plan has admirable objectives but vision will not be delivered by the Plan as set out in SP1.</p> <p>Re Part a) Supports the health, well-being and safety of communities: Selection of higher target for house building than government targets based on a misguided assumption that building houses equals growth and this in turn leads to health and happiness. This does not correlate with majority preference by local people and town &amp; parish councils for lower rates of building. No detail on how building targets will translate into sustainable development objectives, meet vision aspirations or how residential building is part of a pathway to net zero greenhouse gas emissions for the county.</p> <p>Re part b) Supports cohesive communities: An integrated transport network that does not exclude certain groups is a key requirement for community cohesion. Shropshire Council cannot demonstrate that this has been taken into account in draft Local Plan development as the Local Transport Plan is out of date and a new plan will not be in place before Sept 2021.</p> <p>No definition of 'right location' &amp; how will this be assessed and measured? In order to deliver carbon reduction and identify pathway to net zero carbon emissions, definition required and specification of the conditions that must be met to reduce car use and increase the use of walking, cycling and buses</p> <p>Concern in line with issues highlighted in the 2018 report 'Transport for new homes' that the majority of new housing developments in the draft plan located in places with inadequate/limited walking, cycling and public transport connections to surrounding areas forcing car-dependency and adding carbon emissions. Lack of joined-up thinking on how to facilitate and provide the infrastructure to support walking, cycling and public transport for new residents. Absorbing housing demand from adjacent urban areas into a largely rural area is contradictory to net zero transport system aspirations. There is no reference to car-free housing potential or to site selection based on trip estimation data (TRICS) by different modes. Contrary to net zero carbon targets that trip estimation for different locations and configurations of walking, cycling and bus use opportunities have not been factored into locational decisions for new homes. Whilst draft plan says that it references the climate change strategy, ignoring car trip generation and its impact on increasing transport's carbon emissions fails to adequately address the largest contributor to carbon emissions in the county (transport) mainly because the local transport plan out of date.</p> <p>Re part c) Addresses the causes and mitigates the impacts of climate change; Whilst the NPPF does not make explicit the need for the Local Plan to proactively set out the route to a net zero society, as a result of climate change emergency declarations, it should form a core part of the definition of sustainable development. The plan needs to recognise importance of spatial planning in the transition to a net zero transport system and set out how planned developments will contribute to this. Given Plan time period &amp; carbon reduction targets by 2050, together with consequences of failing to deliver reductions, every part of the Plan should consider whether it is reducing or adding to carbon emissions.</p> <p>If any policy cannot be evidenced to its outcome measured in terms of carbon reduction it must be amended. Where a policy is evidenced as increasing carbon, it should be removed. To illustrate respondent references Thames Gateway Bridge (2007) Inspector's Report which identifies greenhouse gas emissions linked to private cars and states that even a small increase offers no assistance in achieving the reduction committed to by the Government. The inspector concluded that the proposed TGB would not comply with national transport planning policy and result in a negative contribution to the Government's commitment to reducing greenhouse gases &amp; recommended that the Bridge should not go ahead. On this basis it is inappropriate for the Local Plan to have exclusions from the requirement to contribute to the net zero pathway on the grounds of economic viability. Therefore, if a development cannot be economically developed in a way that contributes net zero pathway it should not proceed. Thus, references to such exemptions throughout the Plan should be removed.</p> <p>Re part d) Conserves and enhances the high-quality natural environment and provides opportunities for green and blue networks;</p> <p>In respect of blue networks, the promotion of the Shrewsbury North West Relief Road (NWRR) by Shropshire Council within the Local Plan is inconsistent with Para 3 of DP19 (water resources and water quality) as the proposed road includes a major roundabout across the inner Source Protection Zone (SPZ1) of the Shelton Water Supply.</p> <p>Re part e) Raises design standards and enhances the area's character and historic environment: there should be no exemptions from requirements to comply with measures that contribute to the pathway to net zero greenhouse gas emissions.</p> <p>f) Makes efficient use of land; and g) Provides sufficient infrastructure, services, facilities, and where necessary provides opportunities for their enhancement.</p> <p>The largest council promoted scheme detailed in the plan is the proposed North West Relief Road which is likely increase car use and carbon emissions over the plan period. It is therefore not appropriate for the Local Plan to include the promotion of this scheme</p>
A0629	B007-20	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan.
A0629	B007-21	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	<p>All DPs do not &amp; should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan.</p> <p>There should be a greater recognition of the need to supply more accessible natural greenspace for affordable housing developments, as residents tend to have more difficulty sustainably accessing this further afield. Playing Pitch strategy indicates new facilities on new sites are a last resort. Thus, in addition to existing lack of infrastructure for cycling and pedestrians there is also a lack of infrastructure in the design of new facilities including public open spaces for family access.</p>
A0629	B007-22	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	<p>All DPs do not &amp; should contain an explicit link to the ways they will assist in achieving net zero carbon; DPs1-10 inclusive should be re-written to align them with the urgent need to make significant progress towards achieving net zero carbon over the lifetime of the plan. DP10 fails to recognise the importance of shifting tourism car trips as much as possible to public transport and bikes. This is unacceptable.</p> <p>Part f) Although the natural environment as a major tourism draw is recognised, retaining and enhancing natural features is key to the long-term success of the tourism industry. Stronger policy wording required.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0629	B007-2	<p>Modify policy to reflect comments. Comment sets out issues &amp; weaknesses in draft Plan's approach and highlights concerns to be addressed .</p> <p>The following specific modifications identified:-</p> <ul style="list-style-type: none"> <li>-definition required of 'right location' &amp; how will this be assessed and measured and specification of the conditions that must be met to reduce car use and increase the use of walking, cycling and buses.</li> <li>-part (e) remove exemptions from requirements to comply with measures that contribute to the pathway to net zero greenhouse gas emissions</li> </ul>	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-20	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-21	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-22	Explicitly identify within the policy how it will assist in achieving net zero carbon; re-write policy to align with the urgent need to make significant progress towards achieving net zero carbon over the plan period ;Developers should be required to contribute to the upkeep of natural assets to maintain and enhance the tourism offer; Stronger policy wording required in respect of part f) relating to natural environment; policy needs to recognise importance of shifting tourism car trips as much as possible to public transport and bikes.	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0629	B007-23	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon. Policy weak & limited to referencing minimising emissions – not road to net zero. Policy does not form basis for a coherent plan for supporting the county’s contribution towards the national target of net zero by 2050. Unacceptable that evidence in the Local Plan that transport carbon is responsible for 37% of Shropshire’s total carbon, is not used to support policies that explicitly and tangibly reduce car use. Transport carbon reduction is not mentioned in 1a-1d or sections 2, 3 and 4 DP11 (1 C ) We welcome this but we would like to see a commitment to an increased level of on-site renewable energy sources Large commercial/industrial developments must have the same commitment to providing a percentage of their predicted energy needs through on-site renewable and low carbon sources. (cross references comment on 3.134. but no 3.134 in the submission) DP11(4) Disappointing that when reducing carbon emissions and addressing climate change is balanced against profit, profit wins. Given climate emergency this must be the priority.
A0629	B007-24	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; 10% gain for nature target is not ambitious enough it is the minimum when Government proposals are for at least 10% gain; does not align with the Wildlife Trusts & UN who have identified a need for 30% of land to be protected and in recovery for nature. Given the import of the natural environment in Shropshire’s attractiveness as a place to live, do business and visit, protecting the natural environment needs to be at the core of the Local Plan. The Nature Recovery Strategy is about much more than just Biodiversity Net Gain and thus, it should be a constant theme throughout the plan.
A0629	B007-25	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-26	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; Question the infeasibility of producing a green infrastructure opportunity map. Resources to do so could be achieved via partnership with other organisations. NPPF paragraph 174, suggests that maps are needed for restoration/creation areas.
A0629	B007-27	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; Quality and quantity are important and need to be considered more equally
A0629	B007-28	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-29	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-3	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	Whilst the NPPF does not make explicit the need for the Local Plan to proactively set out the route to a net zero society , as a result of climate change emergency declarations, it should form a core part of the definition of sustainable development. The plan needs to recognise importance of spatial planning in the transition to a net zero transport system and set out how planned developments will contribute to this. Given Plan time period & carbon reduction targets by 2050, together with consequences of failing to deliver reductions, every part of the Plan should consider whether it is reducing or adding to carbon emissions. it is inappropriate for the Local Plan to have exclusions from the requirement to contribute to the net zero pathway on the grounds of economic viability. Therefore, if a development cannot be economically developed in a way that contributes net zero pathway it should not proceed. Thus, references to such exemptions throughout the Plan should be removed. We welcome reference to the government’s 25 Year Environment Plan in Para 3.161 SP17 but there should be greater reference to this throughout the document, especially in sections SP3, SP4, and SP9 The Nature Recovery Strategy is about much more than just Biodiversity Net Gain and thus, it should be a constant theme throughout the plan. strategic developments are not located on existing rail infrastructure and so this implies additional road building which is not consistent with the need to address the Climate Emergency

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0629	B007-23	See issues summary. Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed. Specific amendments identified : Explicitly identify within the policy how it will assist in achieving net zero carbon; Modify policy to reflect comments; Include commitment to an increased level of on-site renewable energy sources. Reference information that transport carbon is responsible for 37% of Shropshire's total carbon; Reference transport carbon reduction in 1a-1d & sections 2, 3 and 4 DP11 (2) Include requirement for large commercial/industrial developments to have the same commitment to providing a percentage of their predicted energy needs through on-site renewable and low carbon sources; Policy to prioritise addressing Climate Change over profit	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-24	Explicitly identify within the policy how it will assist in achieving net zero carbon; More ambitious target than 10% for nature gain as per summary of comments; DP12 (4) Add areas within any future Nature Recovery Network to the list to be assessed; DP12 (5) Proposals which are shown to have an adverse effect, directly, indirectly or cumulatively, to those natural assets listed should be refused. Exceptions should only be made in the most exceptional circumstances and there is a for clear methodology on how you compare the value of a natural asset to economic or social benefit.	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-25	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-26	Explicitly identify within the policy how it will assist in achieving net zero carbon; DP14 (4) Green space should be managed and maintained for at least the lifetime of any development; partnership with other organisations to develop a green infrastructure opportunity map should be explored	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-27	Explicitly identify within the policy how it will assist in achieving net zero carbon; Quality and quantity need to be considered more equally	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-28	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-29	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-3	Any policy which cannot be evidenced to its outcome measured in terms of carbon reduction must be amended. Where a policy is evidenced as increasing carbon, it should be removed. Inappropriate for the Local Plan to have exclusions from the requirement to contribute to the net zero pathway on the grounds of economic viability-references to such exemptions throughout the Plan should be removed. Greater reference to Nature Recovery Strategy throughout the Plan. Include more reference to the 25 Year Environment Plan throughout the Draft Plan, especially in sections SP3, SP4, and SP9. Remove references to NWRR.	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. It is also considered that the Nature Recovery Strategy and 25 Year Environment Plan are appropriately referenced within the draft Shropshire Local Plan - it should be noted that the draft Shropshire Local Plan should be read as a whole. References to the North West Relief Road (NWRR) are considered appropriate, although the draft Shropshire Local Plan is not predicated on the delivery of the NWRR. No change proposed.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0629	B007-30	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-32	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-33	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon; The construction of the NWRR on an embankment on the floodplain of the River Severn will increase flood risk upstream. Changed construction to columns to reduce this risk (but increase noise and visual intrusion) was covered adequately in the public consultation and will need to be repeated resulting in timescale implications.
A0629	B007-34	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-35	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-36	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-37	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-38	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-39	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0629	B007-30	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-32	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0629	B007-33	See issues summary. Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0629	B007-34	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-35	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-36	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-37	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-38	Explicitly identify within the policy how it will assist in achieving net zero carbon	Shropshire Council welcomes the support for Policy DP27 as evidence of the soundness of the Draft Local Plan. The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. This is especially promoted through Policy DP27 and the key objectives of the policy to deliver high quality, digital infrastructure that meets the needs of businesses and communities as an essential utility to support their quality of life, to facilitate social inclusion and reduce the need to travel to access work, services and leisure opportunities particularly to support how they choose to work, live and seek to lower the 'carbon footprint' of their business operation or lifestyle.	No
A0629	B007-39	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0629	B007-4	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	<p>DP28 Includes vague aspirational statements not backed by tangibility &amp; therefore of no value. Question whether proposed demolition of Shrewsbury bus station contributes to widening transport choices.</p> <p>Para 4.249 The Hierarchy of Sustainable Transport is a prioritisation tool setting out important principles that will inform overall public policy. Inappropriate to reference the Hierarchy when Council funding &amp; decisions (20mph and bus station) have ignored hierarchy priorities.</p> <p>Reference to NWRW business case needs to reflect NWRW needs to be substantially re worked compared to the Outline Business Case to take into account falling rather than growing levels of traffic ( as detailed in other comments)</p> <p>Part 3e and para 4.257 The largest council promoted scheme detailed in the plan is the proposed North West Relief Road Based on information available at this time it is calculated that it will result in higher levels of car use and increased carbon emissions. It is therefore not appropriate for the Local Plan to include the promotion of this scheme.</p> <p>Para 4.257 Assumptions and justifications for the NWRW are no longer appropriate in light of government policy which will emerge in light of the Climate Emergency and Net Zero CO2 target &amp; result in traffic levels dropping. The business case and justification for the NWRW thus needs reassessment.</p> <p>Adoption of the NWRW in the plan &amp; effectively prioritising development opportunities over carbon emissions reduction is contrary to national net zero carbon objectives of net zero by 2050. It is accepted, including in 1994 Government report, that new roads like the NWRW generate additional traffic increasing transport's carbon emissions. Not acceptable that the Plan's reference to NWRW as the largest transport capital expenditure on undertaken by Shropshire Council does not reference &amp; is not explicitly linked to its carbon impacts. The NWRW is not approved. Independent evidence of the carbon impacts of NWRW needed which can be scrutinised &amp; evaluated. If this evidence indicates that the NWRW will reduce carbon, then this must be stated in the Local Plan, allowing evaluation for robustness and fitness for Local Plan purposes. If independent evidence shows that the NWRW will substantially increase carbon emission (both embodied carbon and use carbon) then it must form part of a realistic assessment of the ability of Shropshire Council to contribute to the achievement in net zero carbon.</p> <p>The existing Local Transport Plan, the existing plan - LPT3 which remains the relevant transport plan does not envisage that the NWRW will be needed during the lifetime of that plan. The NWRW is therefore not an essential part of the Local Plan.</p> <p>All DPs do not &amp; should contain an explicit link to the ways they will assist in achieving net zero carbon.</p> <p>Reference para 4.248 DP28 strategic developments are not located on existing rail infrastructure indicating additional road building which is inconsistent with the need to address the Climate Emergency</p>
A0629	B007-40	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-41	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-42	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-43	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	<p>Allocation assumes NWRW will be built but its traffic won't be included in NWR assessment and should be as the understanding cumulative impacts of developments is essential. The presence of an adjacent Local Wildlife Site and nearby SSSI are included in Sustainability Appraisal text but not counted in the assessment matrix.</p> <p>Question that the site scores well in terms of the climate change assessment (bus stop within 480 m) despite the issue of the number of car journeys being generated being of such a scale that the development would be dependent on the proposed NWRW to accommodate the additional traffic.</p>
A0629	B007-44	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	Welcome reference to the government's 25 Year Environment Plan in Para 3.161 SP17 but there should be greater reference to this throughout the document, especially in sections SP3, SP4, and SP9 The Nature Recovery Strategy is about much more than just Biodiversity Net Gain and thus, it should be a constant theme throughout the plan.
A0629	B007-45	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	We welcome reference to the government's 25 Year Environment Plan in SP17 but there should be greater reference to this throughout the document, especially in sections SP3, SP4, and SP9.
A0629	B007-46	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	We welcome reference to the government's 25 Year Environment Plan in SP17 but there should be greater reference to this throughout the document, especially in sections SP3, SP4, and SP9.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0629	B007-4	See issues summary. Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed; Specific amendments identified : Do not include promotion of NWRR in Draft Local Plan; Omission of content re "widening travel and transport choices" in the Plan needs to be addressed; Explicitly identify within the policy how it will assist in achieving net zero carbon;	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. Policy DP28 recognises that a sustainable transportation system for Shropshire must include a range of transport networks and services and present a range of travel options to individuals, households, organisations and businesses. Policy DP28 constructs the transportation system into a hierarchy to promote sustainable choices by informing and encouraging those travelling or transporting goods to choose sustainable transport options to meet their needs. Although this hierarchy includes modes of transport considered to be unsustainable, these options are still part of the transportation system and may be the best or only means by which to travel or transport goods over long distances or to access less well connected places. To address limitations to achieving modal shifts in a rural County like Shropshire the Local Plan strategy is structured around the strategic transport corridors through the County and seeks to achieve a higher level of urban development. Policy DP28 also recognises the need for more sustainable choices in looking towards the delivery of new travel and transport options and advocates the Hierarchy of Sustainable Transport as a simple decision pathway for everyone to follow in making their choices about travel and transport and by encouraging everyone to consider how they can contribute to reversing adverse changes to our environment. Shropshire Council has set out in Policy DP28 the summary explanation for the North West Relief Road from the Outline Business Case for the construction of this new road. The primary purpose of the road is to link the urban highway network in both the north and the west of the town together to remove the need for local and through traffic to circumnavigate the east, south and west quadrants of the town or to travel through the town centre s opposed to simply traversing the north-west quadrant of the town. This strategic infrastructure proposal has been included in Policy DP28 to recognise a fundamental principal of the Hierarchy of Sustainable Transport which is the continuing need for private motor transport particularly with the national programme to move to vehicles with electronic power cells and other non-fossil fuel energy sources. This continuing need for private transport brings with it a need for essential improvements or new construction on the highway networks to support its use in order to properly serve the needs of the economy and the communities in Shropshire, the West Midlands and England. Shropshire Council considers that the principles and objectives of the Hierarchy of Sustainable Transport and the NWRR are mutually inclusive and contribute to the strengths and opportunities provided by a broad based, balanced and ambitious Local Plan. The Council considers that these two principles and objectives for the Hierarchy of Sustainable Transport and the provision of the NWRR are consistent with the strategy of the Local Plan. The policy framework is also internally consistent with the inclusion of the NWRR in Policy DP28 when the plan is read as a whole.	No
A0629	B007-40	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-41	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-42	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-43	See issues summary. Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed. Need for the traffic implications of SHR173 to be included in the NWRR traffic modelling to assess cumulative impacts; Address highlighted inconsistencies in SA	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-44	n/a- see comments	Noted. It is considered that the principles of the Government's 25 Year Environment Plan are appropriately embedded within the draft Shropshire Local Plan. The draft Shropshire Plan should be read as a whole.	No
A0629	B007-45	Include greater reference to 25 Year Environment Plan	Government's 25 year Environment Plan covers a wide range of issues and where its provisions affect the planning process, they have been appropriately reflected in the draft Policies of the draft Shropshire Local Plan, which should be read as a whole. Shropshire Council does not consider it necessary to include additional references to the 25 year Environment Plan.	No
A0629	B007-46	Include greater reference to 25 Year Environment Plan	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0629	B007-47	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-5	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	S16.1 7, 10a The largest council promoted scheme detailed in the plan is the proposed North West Relief Road (DP28 3e and 4.257 and S16.1 7, 10a). based on information available at this time our calculations indicate that the scheme will lead to higher levels of car use and an increase in carbon emissions in the county during the plan period. It is therefore not appropriate for the Local Plan to include the promotion of this scheme. S16.1 (7) Reiterate comments about the weak case for the NWRR expressed with reference to DP28. NWRR s should be omitted from the Local Plan unless a revised business case and carbon assessment shows that it still makes economic and environmental sense. The Shrewsbury Place Plan appears to allow commercial development but not residential in the area west of Ellesmere Rd but this is not clear in the document. Part 10a Re the reinforcement and enhancement of the local and strategic highway network: Investment in new roads is not consistent with the Climate Emergency or Net Zero CO2 target. Shrewsbury Integrated Transport Strategy, the Big Town Plan Movement Strategy and the Shropshire Local Transport Plan: None of these documents are available for the consultation and it is not clear how they support or are supported by the NWRR Para 5.225 Allocation of SHR173 assumes NWRR will be built but its traffic won't be included in NWR assessment and should be as the understanding cumulative impacts of developments is essential
A0629	B007-6	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	In respect of blue networks, referenced in Shropshire Test Policy SP1 we agree with policy DP19 (water resources and water quality) however promotion of the Shrewsbury North West Relief Road (NWRR) by Shropshire Council within the Local Plan is inconsistent with Para 3 of this policy as the proposed road includes a major roundabout across the inner Source Protection Zone (SPZ1) of the Shelton Water Supply. All DPs do not & should contain an explicit link to the ways they will assist in achieving net zero carbon.
A0629	B007-8	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	High quality design should not compromise sustainability and should incorporate extensive sustainable design features beyond solar.
A0629	B007-9	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 / DP26	Yes	No	Yes	Para 6 & 7. Welcome the inclusion of Sport's England's '10 principles of active design' as a requirement. However, it is not possible for individual developments to contribute properly to well-designed walking and cycling routes without a high level strategy of where these routes need to be. In this respect, Shropshire Council's refusal to develop a Local Walking and Cycling Infrastructure Plan will largely negate the potential benefits of this policy.
A0629	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 and Para 2.31	Yes	No	Yes	The draft Vision is not consistent with Shropshire Council objectives that Shropshire achieves net zero carbon by 2030. Consider the text of draft Policy SP1 does not reflect the draft Vision, nor does it the recently adopted Shropshire Council Climate Plan, so is not sound and incomplete.
A0629	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	Yes	No	Yes	Para 2 of draft Policy SP1 should include reference to the Shropshire Climate Change Framework (acknowledges declaration of a climate emergency, establishment of a strategic framework to achieve the objective of net zero corporate carbon performance by 2030 and supporting achievement of a suitable objective for net zero carbon Shropshire. Shropshire Council subsequently became a member/supporter of Shropshire Climate Action Partnership and the Zero Carbon Shropshire Plan with its objective of achieving net zero carbon Shropshire by 2030. Policies should aim to secure radical carbon reductions in line with a trajectory for the authority area that is consistent with Shropshire achieving net zero carbon by 2030 and the UK achieving full carbon neutrality by 2050, and in the short term should test the policy options available to achieve the highest level of ambition possible to meet this goal.
A0629	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	No	Yes	Within para 2 of draft Policy SP2, it is not clear what the definition of "employment land" is. The amount stated here is wholly insufficient to allow Shropshire to realise its renewable energy commitment if land use for photovoltaic arrays and any other forms of renewable electricity generation are included within the scope of employment land.
A0629	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and Para 3.28	Yes	No	Yes	Para 3.28 of the explanation to draft Policy SP2 identifies strategic corridors in Shropshire. Question the ability for the A41 strategic corridor to deliver true sustainable economic growth as there is no bus service along the A41. Public transport to and from Market Drayton and Whitchurch involves travelling via Shrewsbury along the A53 which is not considered a strategic corridor.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0629	B007-47	Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-5	See issues summary . Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed .Modify policy to reflect comments; The following specific modifications identified: Do not include promotion of NWRR ; NWWR s should be omitted from the Local Plan unless a revised business case and carbon assessment shows that it still makes economic and environmental sense. Clarify development proposals west of Ellesmere Rd; Address inconsistency that investment in new roads to achieve reinforcement and enhancement of the local and strategic highway network incompatible with carbon reduction:	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B007-6	See issues summary. Changes identified as part of a commentary on issues with draft Plan's approach and highlights concerns to be addressed. Explicitly identify within the policy how it will assist in achieving net zero carbon	The Council considers that the Policy provides appropriate and adequate protection for groundwater Source Protection Zones. The Council also considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0629	B007-8	High quality design should incorporate extensive sustainable design features beyond solar. Strengthen with additional guidance: "should be designed to integrate space for both people and wildlife, reduce carbon emissions and minimise water usage".	Noted. Draft Policy SP5 already states "Design and layout positively responds to our changing climate by taking opportunities to maximise energy efficiency (including maximising opportunities for solar gain), minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan". Furthermore the draft Shropshire Local Plan should be read as a whole and wider draft policies also address these issues. For instance draft Policies SP3 and DP11 address climate change and minimising carbon emissions; draft Policy SP6 addresses health and wellbeing, including consideration of "the provision of appropriate levels of private and public open space"; draft Policy DP15 addresses provision of open space within development; draft Policies DP14 and DP16 address green infrastructure and landscaping of new development respectively; and draft Policy DP20 addresses water efficiency.	No
A0629	B007-9	Need for high level strategy for walking & cycling routes & Local Walking & Cycling infrastructure Plan	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0629	B008	The draft vision for Shropshire should be amended to replace reference of positively moving towards a zero carbon economy to moving forwards as a zero carbon economy. Draft Policy SP1 should be amended to include "Regards the Spatial Vision for Shropshire set out in 2.31 above as a mandatory test for any decision including any planning decision made by Shropshire Council."	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B009	Revise para 2 of draft Policy SP1 to read: "In addition, and where appropriate proposals should seek to reflect relevant considerations of Shropshire Council's objectives for net zero carbon Shropshire by 2030, and other strategies, including its Community Led Plans, Local Economic Growth Strategies (including the Shrewsbury Big Town Plan), the Local Transport Plan, the Public Health Strategy and the need for all new planned development to be of zero carbon standard from 2030 in line with declared objectives responding to the Declared Climate Emergency."	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B010	In para 2 of draft Policy SP2 add "For the avoidance of doubt, 'employment land' excludes areas used for the development and operation of systems producing renewable energy." Or, at a suitable and binding place in the strategy, provide a proper definition of 'employment land' and other land use types referenced in the Strategy that incorporates this definition. Or provide a reference to an external accepted standard that clearly incorporates this definition.	Noted. The draft Shropshire Local Plan should be read as a whole. Para 2 of draft Policy SP13 explains what employment generating uses will comprise.	No
A0629	B011	The term strategic corridor should be defined as one along which some form of public transport – bus or rail - is provided. Current meaning seems to imply 'an A class road'	Draft Policy SP14 and the associated Shropshire Economic Growth Strategy explain that 'Strategic Corridors' are the principal rail and strategic road routes through the County. This is considered an appropriate definition for these corridors.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0629	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	No	No	Yes	<p>Whilst accepting the general strategic approach, question the scale of development (housing and employment land). Consider pursuing housing in excess of need is not a sustainable approach and reflects a focus on economic growth (contrary to section 2 of the NPPF which states the three overarching objectives of sustainable development (economic, social and environmental) need to be pursued in mutually supportive ways (so opportunities can be taken to secure net gains across each). This concern filters down to place plan areas/sites which are placed under additional pressure to deliver housing beyond need.</p> <p>The move to a low carbon economy (para 8 of the National Planning Policy Framework (NPPF)) and to net zero by 2050 (Climate Change Act 2008 as updated) requires elimination of emissions at source and careful limitations on the amount of carbon embodied in construction - some construction will have very long/will not within their lifetime repay embedded carbon. Section 19 of the Planning and Compulsory Purchase Act, paras 148-149 (incorporating footnote 48) of the NPPF and supporting National Planning Practice Guidance (NPPG) require Local Plans to carbon audited, and to “contribute to radical carbon emission reductions in line with the Climate Change Act”.</p> <p>The future homes standard consultation has been published confirming Government is intending to tighten building regulations in relation to carbon emissions. Consider wording relating to 'strongly encouraging' zero carbon could be tightened to 'should be' zero carbon for major development.</p>
A0629	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	No	Yes	<p>In proposing Community Cluster developments, no mention is made to transport infrastructure or public transport requirements. Rural Community Cluster developments result in a larger carbon footprints than those in urban centres – where new developments should be concentrated (consistent with conclusions from the Committee on Climate Change).</p>
A0629	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Yes	No	Yes	<p>Whilst welcoming inclusion of a specific Climate Change policy (draft Policy SP2), feel it needs to be more strongly worded. For example “Climate Emergency” would be a better policy title reflecting Shropshire Council’s declaration.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0629	B012	<p>For all development proposals above a certain threshold (e.g. £2m/10 dwellings/1ha), an assessment of net lifetime emissions including embodied carbon will be required. Where this exceeds 25gm/£1 with repayment times above 10 years development will only be permitted in very special circumstances.</p> <p>SP2 should be revised to reduce the level of new building.</p> <p>Development Plans should comply with para 69 of the National Planning Policy Framework (NPPF) to “identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare”.</p>	<p>Noted. The requirement to assess lifetime emissions of development proposals does not derive from either national planning policy or national planning practice guidance. As such the Council does not consider it necessary to include it in the Local Plan.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>The proposed strategy for achieving the proposed housing requirement includes a significant proportion of sites with capacity for less than 10 dwellings (net), exceeding the 10% figure within the National Planning Policy Framework (NPPF). This includes completions achieved between 2016/17 and 2019/2020 of around 1,900 dwelling; and existing commitments (sites with Planning Permission, Prior Approval or proposed 'saved' Allocations that have not yet secured Planning Permission) and proposed allocations with a capacity of around 2,650 dwellings. Furthermore windfall allowances for settlements and windfall development in the rural area inevitably will include considerable numbers of sites of less than 10 dwellings (the most recent Five Year Housing Land Supply Statement explains that small scale windfall sites of less than 5 dwellings have always represented a significant component of the housing land supply in Shropshire, and it is anticipated that this will remain the case. It also explains that the average completion rate on all small scale windfall sites of less than 5 dwellings over the plan period 2006/07-2019/20, is some 378 dwellings per annum and the actual rate for 2019/20 was some 329 dwellings).</p>	No
A0629	B013	<p>Transport infrastructure, including access to public transport should be included in the criteria for selecting rural development sites in policy SP2.</p>	<p>Noted. The proposed strategic approach for the distribution of development includes the principle of urban focus, by which the majority of development is directed towards urban areas. However, recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in urban areas will be complemented by appropriate new development within Community Hubs, which are considered significant rural service centres; and to a lesser extent Community Clusters, which consist of settlements with aspirations to maintain or enhance their sustainability. This is considered an appropriate, effective, sustainable and deliverable strategy. The specific criteria for development within Community Clusters is identified within draft Policy SP9, this includes that there is sufficient infrastructure capacity to support the development, or any infrastructure capacity constraints can be addressed through the development, consistent with relevant policies of this Local Plan.</p>	No
A0629	B014	<p>SP3 is an expression of intent. Hard targets or key performance indicators need to be added given the county' adoption of a Climate Emergency.</p>	<p>The Council considers that the approach taken is consistent with national planning policy and guidance. No change proposed.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0629	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Yes	No	Yes	<p>There are a number of problems with the draft Shropshire Local Plan and as such it is legally unsound in terms of climate change mitigation policies and duties:</p> <ul style="list-style-type: none"> <li>-Section 19 of the Planning and Compulsory Purchase Act, paras 148-149 (incorporating footnote 48) of the National Planning Policy Framework (NPPF) and supporting National Planning Practice Guidance (NPPG) require Local Plans to carbon audited, and to “contribute to radical carbon emission reductions in line with the Climate Change Act”, this has not occurred. This process is essential and will identify the need for/support very ambitious planning policies around building performance and renewable energy if the required carbon reduction strategy is to be achieved.</li> <li>-It should demonstrate how net zero carbon Shropshire will be achieved by 2030, in line with Government policy/Council objectives and require new developments/activities to be aligned to this objective.</li> <li>-References to reducing carbon emissions are general rather than objectively measurable as required.</li> <li>-The evidence base for the draft Shropshire Local Plan should provide an overall carbon budget for the district to 2050, consistent with the updated Climate Change Act. Policies should aim to secure radical carbon reductions in line with a trajectory for the authority area to achieve full carbon neutrality by 2050 and in the short term achieve highest level of ambition possible to meet this goal (to the extent possible).</li> </ul> <p>Relevant draft Policies must be amended to align the draft Shropshire Local Plan with the declared climate emergency declaration, achieving the net zero carbon Shropshire 2030 and Government policy.</p> <p>Para 2d of draft Policy SP3 limits possible energy generation as a response to climate change to a scale of local generation and distribution. This is not sound in light of the national need for renewable generation. Draft Policy SP12 is referenced several times in the draft Shropshire Local Plan and may be intended to cover this point but is not binding. Policies provide a list of potential negatives of renewable energy rather than a positive strategy for delivery. Policies should give specific encouragement to community energy projects and defining what is meant by “community energy” (as per para 152 of the NPPF).</p>
A0629	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Yes	No	Yes	<p>Within para 1f of Draft Policy SP3, electric charging infrastructure should be mandatory in all new development. “Wherever possible” is an easy to apply get-out (the committee on climate change reach broadly similar conclusions).</p>
A0629	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	Yes	No	Yes	<p>The purpose of the draft Shropshire Local Plan is to achieve sustainable development not to achieve the aspirations of the Economic Growth Strategy. Draft Policy SP4 is not a robust interpretation of the Brundtland report definition of ‘sustainable development’ and that which now advanced by the HMT Dasgupta Review 2021 on the Economics of Biodiversity.</p>
A0629	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5 and Para 3.40	Yes	No	Yes	<p>Para 3.40 of the explanation to draft Policy SP5 should reference the need to comply with para d of draft Policy DP11.</p> <p>There is an inconsistency between para 3a of draft Policy SP5 (designed to maximise fabric energy efficiency), para 1b of draft Policy DP11 (19% improvement on building regs) and para 1d of draft Policy DP11 (strongly encouraging zero carbon).</p> <p>Shropshire Council has declared a climate change emergency a clear justification for the draft Shropshire Local Plan to ensure the zero carbon standard is met and use of energy networks maximised.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0629	B015	<p>Para 1(g) of draft Policy SP3 should be integrated within draft Policy DP23 which sets out the Council's approach to conserving and enhancing the historic environment. Policy DP23 makes no mention of energy efficiency retrofitting, and this is the council's main policy covering conservation and listed buildings so suitable amendments are vital to these policies if they are to achieve the intended objectives.</p> <p>Para 2 of draft Policy SP3 supports community energy proposals, but this is not reflected in draft Policy DP26. Suitable amendments are required to achieve this.</p> <p>Para 3 of draft Policy SP3 is about maximising carbon sequestration and needs to be better integrated within draft Policies DP14 and DP16.</p> <p>Delete Para 4 of draft Policy SP3 and replace with the following: "Development will be expected to include site and building-level measures to be resilient to future climate change impacts and provide for the comfort, health, and wellbeing of current and future occupiers and the surrounding environment over the lifetime of the development. These measures should be integral to the layout and design of new development and should take the vulnerability of the building occupants into account.</p> <p>Site-level adaptations: Development should be designed, through its layout, form and massing and through the use of green/blue infrastructure, to: 1 Minimise the overheating of buildings; 2 Provide comfortable external spaces in hot weather; and 3 Conserve water supplies and minimise the risk and impact of flooding.</p> <p>The use of green/blue infrastructure should provide multifunctional benefits in relation to climate change adaptation. Where appropriate to its context, this should include the use of living roofs with a sufficient substrate depth to maximise cooling benefits.</p> <p>Building-level adaptations: Building designs and building-integrated measures should: 1 Mitigate the risk of overheating, ensuring that cooling needs are met sustainably; 2 Conserve water supplies; and 3 Avoid responses to climate impacts which lead to increases in energy use and carbon dioxide emissions.</p> <p>Adaptation strategy: Proposals for development should demonstrate through an adaptation strategy how these issues will be addressed. This should include technical modelling and assessment of the risk of overheating in current and future climate change scenarios. In considering the likely impact of climate change over the lifetime of the development (particularly in relation to overheating), reference should be made to the most recent climate change projection. Para 2 of draft Policy SP3 should also include "e) supporting the development of renewable energy generation schemes at a level compatible with viable business opportunities, to promote economic growth."</p>	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0629	B016	Amend para 1f of draft Policy SP3 to read: "Enable the installation / integration of electric vehicle charging infrastructure into new development, in line with the requirements of DP11; and"	The provision of electric vehicle infrastructure is covered by Building Regulations rather than the planning system. No change proposed.	No
A0629	B017	The term sustainable development is used more than 20 times in the Plan, but is not defined. The definition adopted by the World Commission on Environment and Development's 1987 Brundtland report 'Our Common Future' should be adopted: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs". This definition recognises current levels of development should be kept to a minimum in order to preserve biodiversity for the future.	Noted. It is considered that the draft Shropshire Local Plan provides an appropriate, sustainable and deliverable vision and framework for the future development of Shropshire. The principle of sustainable development, as defined within the National Planning Policy Framework (NPPF), underpins the draft Shropshire Local Plan. Draft Policy SP4 is considered to be consistent with the presumption in favour of sustainable development documented within the NPPF.	No
A0629	B018	Revise para 1d of draft Policy DP11 to state: "Ensuring all proposals for one or more dwellings and in particular residential development of 50 or more dwellings to: i. Achieve zero net-carbon emissions; ii. Maximise the use of on-site district heating and cooling systems, especially where these utilise renewable energy and iii. Maximise opportunities to connect to wider heating and cooling networks both for energy supply and export, especially where these utilise renewable energy." This is supported by the Future Homes Standard - The wording, "strongly encouraging" could be tightened up considerably, along the lines of the London Plan: "major development should be zero carbon".	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0629	B019	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Yes	No	Yes	The term “unviable” in para 4 of draft Policy DP11 is too poorly defined to prevent low quality development in an otherwise very well defined sound policy. All the well stated aspirations laid out within the policy are too easily ignored by the unscrupulous use of “value engineering” and “viability tests” that have undermined many similar aspirational policies in the past.
A0629	B020	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Yes	No	Yes	There is no explicit reference to climate change in para 5 of draft Policy SP5 or para 3.40 of the explanation to draft Policy SP5. This is considered an omission if the draft Shropshire Local Plan is to reflect the broader demand of quality design. Other elements of the Local Plan such as DP11 make it clear that minimising carbon emissions is considered fundamental.
A0629	B021	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	Yes	No	Yes	Within para 3 of draft Policy SP10, the phrase ' maintain or enhance countryside vitality and character' is too tightly drawn to allow for new forms of employment to emerge – it condemns the rural area to a fixed and probably obsolete pattern of employment generation and land use.
A0629	B022	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	Yes	No	Yes	There is no policy on large intensive livestock units, which have huge environmental problems. Agricultural development is mentioned in draft Policy SP10 but the policy content is not adequate to address the significant factors around this big issue for Shropshire.
A0629	B023	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Yes	No	Yes	Para 3 of draft Policy SP10 is inconsistent with paras 4f and 5b of draft Policy SP12 and needs to be amended. The range of 'rural economic enterprises' in para 4f of draft Policy SP12 are too limiting. The phrase 'rural diversification' implies an existing enterprise undergoing some change, not the creation of new and innovative types of enterprise. This is not consistent with the broader investment objective stated at 5b). Para 5b of draft Policy SP12 is drawn to suggest that local low carbon energy investment should be wholly local. This fails to recognise the direction in which the energy generation and distribution industry is moving nationally; towards a peer-to-peer smart and flexible electricity generation and distribution system.
A0629	B024	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Yes	No	Yes	Within para 5 of draft Policy SP12 there is no reference to the need to support employment through promoting training in low carbon and retrofit skills, the lack of such skills will be a limit to growth in a sector with huge potential over coming years.
A0629	B025	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Not Specified	No	Not Specified	Para 5e of draft Policy DP12 references the adoption of new and more sustainable transport options to improve accessibility in Shropshire and remove capacity constraints to future business investments (committee on climate change have reached broadly similar conclusions on the need to deliver modal shift from cars to walking/cycling/public transport and promote walking/cycling infrastructure in development). There is little in the draft Shropshire Local Plan which supports this commitment. Investment should be prioritised for sustainable transport in appropriate locations, as road transport is a major contributor to the Climate Emergency.
A0629	B026	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	Yes	No	Yes	No scope in draft Policy SP13 for employment generation in response to climate change activity nor any Shropshire Council policy. This policy is negligent / deficient in it's representation of these issues.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0629	B019	Revise para 4 of draft Policy DP11 to include: "This demonstration shall at the minimum include a clear calculation of predicted carbon emissions, the cost of mitigation of those emissions through good design or through offsetting by on site renewable generation. Where the viability test is accepted then all sales literature or public promotion of the development should include the facts as to why the development fails to meet expected carbon standards."	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B020	Revise para 5 of draft Policy SP5 to read: Permission will be refused for development of poor design and that fails to take the opportunities available for improving the character and quality of an area, the way it functions where it would adversely affect the well-being of others and its adverse impact on the climate and where inadequate information has been submitted to demonstrate how new development will ensure the quality of design. Revise Explanation note 3.40 to read: All planning applications for new development should set out how they comply with Policy SP5, the principles of the West Midlands Design Charter and comply how they comply with the design requirements of the other policies contained in this Local Plan and shall include a clear Carbon Statement which details predicted carbon emissions and the methods and costs of achieving a net zero carbon development.	Para 3a of draft Policy SP5 states "Design and layout positively responds to our changing climate by taking opportunities to maximise energy efficiency (including maximising opportunities for solar gain), minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan". Para 3.40 recognises that planning applications should set out how they comply with... "design requirements of the other policies contained in this Local Plan", this includes design requirements of draft Policy DP11. The draft Shropshire Local Plan should be read as a whole.	No
A0629	B021	Delete the wording "...where they maintain or enhance countryside vitality and character,"... from para 3 of draft Policy SP10.	Noted. Shropshire Council considers that it is appropriate to include consideration of maintenance or enhancement of countryside vitality and character in the context of proposals for sustainable employment, tourism, leisure, other business and community development proposals in the countryside.	No
A0629	B022	Draft Policy SP10 needs to look at the planning considerations in respect of warehousing type buildings being erected and totally out of keeping in rural settings.	Noted. It is considered that the approach set out in SP10 is appropriate. Policy SP10 specifies that for positive consideration of agricultural proposals should 'maintain or enhance countryside vitality and character' and comply with all other relevant policy. Additional requirements are identified for large scale new development, with separate criteria for agricultural developments and other particularly relevant policies, including that relating to the AONB, signposted. The draft Shropshire Local Plan has to address a wide range of issues and requirements and is intended to be read as a whole. Therefore, in addition to the criteria set out in Draft Strategic Policy SP10, the relevant considerations of all other applicable policies will need to be taken into account in decision making on planning applications, along with other material considerations which can include other plans such as the AONB Management Plan which is directly referenced in draft Policy DP24.	No
A0629	B023	Add an addition point under para 4f of draft Policy SP12 stating: "iii) Innovative enterprises that seek to support Shropshire Council's climate change objectives. Sustainable employment, tourism, leisure, other business and community development proposals in the countryside will be positively considered, where they maintain or enhance countryside vitality and character, including through the use of previously developed land, and are consistent with national Green Belt policy and the wider policies of this Local Plan..." Revise para 5b of draft Policy SP12 to state: Renewable and low carbon energy generation including decentralised energy sources and to promote the productive use of this energy by businesses to reduce energy costs and increase energy 'independence' in the local and regional economy;"	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0629	B024	Include an additional sub-para under para 5 of draft Policy SP12 stating "g. Support and encourage local businesses and colleges to develop and sponsor skills training associated with new low carbon building technologies and with low carbon retrofit skills certification."	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0629	B025	Para 5e of draft Policy SP12 should be amended to read more positively: "Transport and utilities infrastructure and the adoption of new and more sustainable transport solutions to improve accessibility in Shropshire, by the removal of capacity constraints to enable future business investments and to contribute towards climate management objectives; and"	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0629	B026	Add an additional para to draft Policy SP13 stating "To prefer employment development in green industries, particularly those involved in low carbon energy generation and to prioritise employment generation in these industries where there is a choice of other alternatives."	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0629	B027	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	Yes	No	Yes	Draft Policy SP15 does not encourage estate owners to consider opportunities in low carbon energy generation. This is of particular concern in that the largest proportion of Shropshire land area comes under such ownership.
A0629	B028	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16	Yes	No	Yes	Para 8 of draft Policy S16.1 defines the specific aspirations for Shrewsbury Town Centre and references the Big Town Plan but no reference is made in the Big Town Plan to the need for carbon free development, so it must be added here to ensure the completeness of the draft Shropshire Local Plan document in reference to Shrewsbury Town Centre.
A0629	B029	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP26	Yes	No	Yes	<p>Requirements of the Climate Change Act (CCA) are implicit in the National Planning Policy Framework (NPPF) (references the CCA in footnote 48 and para 149 and a more general reference in para 148). Extracts of these documents provided in representation. This should be carried through and reflected in the content of the draft Shropshire Local Plan, which also needs to support the objectives of the CCA.</p> <p>The definition of 'soundness' of a Local Plan requires consistency with the NPPF and for it to be 'justified – an appropriate strategy'.</p> <p>Having regard to paras 20 and 21 of the NPPF, the draft Shropshire Local Plan should regard provision of energy as a strategic planning item and therefore not bound to more local policy expressed, for instance, through neighbourhood plans.</p> <p>Draft Policy DP26 of the Shropshire Local plan is defective against these requirements and considerations and also introduces constraints not supported by the NPPF, as:</p> <ul style="list-style-type: none"> <li>-It limits Shropshire's ability to play its part in responding to national energy policy (as set out in the CCA) by placing differential limitations of the types of renewable energy that may be deployed (wind v non-wind renewables). This seems to follow from the NPPF and is not reflected in the CCA (makes no distinction between the types of technologies needed to reduce greenhouse gases), thus the limitation is weak.</li> <li>-It imposes limits of the scale of such deployment by linking it to neighbourhood plans, where such linkage is not supported by the NPPF. The requirement of footnote 40 of the NPPF, to consult the affected local community once suitable areas have been identified within the development plan (with regard to relevant wind turbine proposals) is ambiguous. It does not limit the scale of any such plan nor the implied scale of the 'affected local community'. Translation of this by para 4a of draft Policy DP26 into 'an adopted Neighbourhood plan', which has a specific geographic constraint, is thus not supported by the NPPF.</li> <li>-The Climate Change Committee Budget 6 and other considerations indicate need for electricity will double in the UK over the next 10 to 20 years. This implicit limitation of scale in draft Policy DP26 to the 'very local' makes it impossible for the draft Shropshire Local Plan to allow appropriate renewable energy deployment at a scale that will allow Shropshire to fully meet its implicit commitment to national energy policy. Further it is inconsistent with other parts of the draft Shropshire Local Plan (particularly draft Policy SP12) as it impacts on the ability to fully utilise natural resources for Shropshire regional economic development (as set out in para 5b of draft Policy SP12). Para 4.230 of the proposed explanation of draft Policy DP26 is more positive on this matter.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0629	B027	Add an additional sub-para to draft Policy SP15 stating: "That they can demonstrate that that they have fully and properly considered opportunities for low carbon energy generation and can demonstrate good long term economic reasons why this is or is not possible."	Noted. Consideration of opportunities for renewable and low carbon energy generations can clearly form part of the scope of Whole Estate Plans. However, it is not considered appropriate to include specific considerations for these documents, as this list could be very extensive and the documents themselves will inevitably be diverse and varied.	No
A0629	B028	Within para 8 of draft Policy S16.1 include "Further, to take advantage of the implementation of the Big Town Plan as a key intervention opportunity to begin the development of a zero carbon Town Centre through low carbon refurbishment and the introduction of a low carbon heat network", between the existing sentences relating to opportunities for mixed-use development incorporating retail, leisure, residential and employment and proposals which support the delivery of the objectives of the Big Town Plan, and which are in line with the other policies of the Local Plan, will be supported.	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No
A0629	B029	Draft Policy DP26 should be re-written as follows: The delivery of sustainable communities in Shropshire relies on the provision of new strategic infrastructure and the continued operation of existing strategic infrastructure. Proposals which are likely to affect an internationally designated wildlife site will require a project level HRA in accordance with Policy DP12. Existing Strategic Infrastructure: 1. Development will be expected to demonstrate that it will not adversely affect, either directly or indirectly, the continued operation and potential expansion of existing strategic infrastructure. New Strategic Infrastructure: 2. Renewable and low carbon development will be supported where its impact is, or can be made, acceptable. To aid in this determination, all applications should be accompanied by a strategic assessment, involving all affected communities, of the proposal's effect on the following during both the construction, operational and post operational stages: a. Visual amenity (including the considerations within Policy DP17); b. Landscape character (including the considerations within Policy DP17); c. Natural assets (including the considerations within Policy DP12); d. Historic assets (including the considerations within Policy DP23); e. Air quality, noise and public amenity (including the considerations within Policy DP18); f. Water quality and water resources noise (including the considerations within Policy DP19); g. Traffic generation and the nature of vehicle movements; h. The Shropshire Hills AONB (including the considerations within Policy DP24); i. Hydropower applications should pay attention to fish stocks and normally be accompanied by a Flood Risk Assessment (see also Policy DP21); j. Biomass, energy from waste, biogas and anaerobic digestion proposals should also address the impact on vibration, odour and dust (the latter for biomass and energy from waste only). Opportunities to recover heat and power are encouraged in accordance with Policy SP3; k. Large scale proposals should show how they have made effective use of previously developed and non-agricultural land. Where a proposal requires the use of agricultural land, poorer quality land should be used in preference to land of a higher quality (see also Policy DP18). Proposals should allow for continued agricultural use wherever possible and/or encourage biodiversity improvements around installations; and l. Consideration of aircraft safety, (including defence operations). 3. In addition to the general provisions above at a-l above: a) For PV schemes the assessment should pay particular attention to the impact of glint and glare on neighbouring land uses and residential amenity. b) For wind schemes the assessment should pay particular attention to turbine generated noise and impact on bird movements. 4. The scale of installations should be assessed as a strategic planning issue. 5. The assessment should be proportionate to the development proposed and include sufficient information to allow for an accurate evaluation of all impacts, both negative and positive. It should cover necessary ancillary development such as security measures, lighting, access tracks and fencing. Impacts should be considered cumulatively against those existing or consented development types with similar impacts in the surrounding area. Mitigation measures to remove or reduce adverse impacts should be identified. 6. Monitoring and Decommissioning: a) Where planning permission establishes performance standards, applicants will be expected to demonstrate compliance through the submission of regular monitoring reports. b) Proposals for temporary infrastructure will be expected to include measures for satisfactory restoration, including progressive restoration, of the site at the earliest practicable opportunity to an agreed after-use or to a state capable of beneficial after use. c) Where appropriate, planning obligations will be sought in order to secure the after-use, long term management and maintenance of the site.	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0630	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	Relaxing the requirement for Hubs to have both 'significant employment' and 'peak time public transport' makes the Hierarchy of settlements unsound. This is also contrary to the proposed Climate Change and Sustainability Objectives SO5, SO6 and SO12 which seek to reduce carbon emissions by reducing travel by private vehicles making it unsound. The adding of the vague and undefined phrase 'a larger range' of services and facilities to compensate for the lack of these facilities is subjective. This is contrary to the Hierarchy of Settlements attempt at objective comparison between settlements. The scoring system used in Table 10 is flawed and inaccurate making the threshold dubious. It is not an appropriate or robust assessment which makes it unsound. As the SP2 Strategic Approach para 6 relies on this it is therefore also unsound.
A0630	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and S14.2	Not Specified	No	Not Specified	SP2.2 Community Hubs. Trefonen is the only proposed Hub that does not have significant employment and peak time public transport. It would be contrary to SP3 Climate Change and Sustainability Objectives SO5, SO6 and SO12 if it was allocated hub status. This would be unsound.
A0631	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2, SP3 and SHR060	Yes	No	Yes	Although Shropshire Council recognises the imminent need for climate change it is recommending building approx. 5000 houses more than the fulfilment requires.
A0632	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13 Much Wenlock	No	Not Specified	Not Specified	Not legally compliant because it ignores the 2014 adopted Neighbourhood Plan (Act of Parliament). The Neighbourhood Plan does not call for around 200 dwellings, in one batch, but for gradual development which allows the town to retain its character and to improve its infrastructure; drains, roads, alleviation of flooding, in line with development. The Council has not met its commitment to meaningful public engagement. The work of Neighbourhood Plan Refresh has been ignored by both Shropshire Council and the Town Council. This is inexplicable. Much Wenlock is fortunate to have both committed life-long residents and newer arrivals – retirees with time and energy to care. No-one wants to stop all development but they want a step by step approach to meet local needs – e.g. affordable housing, housing for the elderly. They want elected representatives who listen, consult and liaise openly with all concerned; the public, land-owners, Severn Trent, traffic managers. Plans to manage the flood risk and a huge increase of traffic from neighbouring developments are far from clear.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0630	B001	<p>The Hierarchy of Settlements needs to be amended to fulfil the SP3 Climate Change and Sustainability Objectives SO5, SO6 and SO12 to minimise car travel and reduce carbon emissions.</p> <p>The vague wording used to relax the original criteria in Para 5.41 needs to be removed and the original requirement to have both significant employment and peak time public transport must be reinstated.</p> <p>The Hierarchy of Settlements then needs to be reviewed using this criteria and the draft plan development status and allocations amended as appropriate.</p>	<p>Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire.</p> <p>Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.</p> <p>As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub.</p> <p>Shropshire Council also considers that the development strategy proposed for Trefonen, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.</p>	No
A0630	B002	<p>Trefonen should be removed from the Community Hub settlements in Policy S14.2 Community Hubs – Oswestry Place Plan Area and schedule SP2.2 Trefonen should be allocated as a Rural Settlement. Affordable Exception and Rural Exception would provide for the needs of local people in small scale development. The cumulative impact of these should be controlled by additional wording in the Affordable Exception Policies DP4, DP5, DP6 and DP7.</p> <p>Any development should conform to the Village Design Statement and this should be written into SP5 High Quality Design.</p>	<p>Shropshire Council undertook a robust assessment during the Hierarchy of Settlement process and Trefonen's services and facilities meant that its score resulted in it being a Hub. Notably there are no housing allocations in the settlement as part of this Plan Review. A minor modification is proposed to reduce the gross housing requirement for the village over the plan period (see response to A0605)</p>	No
A0631	B001	<p>Over development - far too many new houses in an area of not much more than 1 sq. mile</p> <p>1500+ dwellings proposed</p> <p>425 newbuilds (less than 5yrs old) Darwin's Walk &amp; Bowbrook Meadows</p> <p>126 currently being finished on Radbrook Rd</p> <p>The density of the proposed housing is particularly high in SHR060</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Shropshire Council also considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.</p>	No
A0632	B001	<p>S13.1. Development Strategy: Much Wenlock Key Centre</p> <p>1. Much Wenlock will act as a Key Centre and contribute towards strategic growth objectives in the east of the County delivering housing and employment development land in line with strategy outlined in the Neighbourhood Plan adopted in 2014 and updated by Neighbourhood Plan Refresh.</p>	<p>The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides an appropriate development strategy for the settlement.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0633	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document [Part 1]	No	No	No	<p>Previous consultations failed to comply with the law and policy guidance on sustainability appraisals and hence also failed to comply with the law on the Plan complying with sustainable development requirements. Appraisal scoring did not include all the criteria stated to be assessed and the Plan allocated an employment site in Shifnal that had not been appraised at all. No reasons were given as to why more sustainable alternatives were rejected as required by the law. Information related to the SAs especially identification of site references to actual locations was not cross referenced or in one easily accessible location as required by case law (see attached statement for a detailed analysis of the law and its non-compliance here). The consultation process failed to comply with all four legal principles a consultation process has to legally follow as set out in the Gunning case law. Proposals in the Plan for the Shifnal Employment Site and RAF Cosford were being advertised in the Council's Invest in Shropshire brochure and on their website as being available for development before consultations took place. There has also been no response to objections made and evidence submitted indicating that the proposals were pre-determined as the Council have decided not to put forward any reasoning to rebut the objector's evidence. The evidence base on the website has not provided many of the documents quoted in the Plan as being key to the proposals in the Plan. There is considerable inconsistency in the figures used, such as employment for the County and Shifnal, so that the public do not know which is the correct ones to be able to comment on. This is especially important when large amounts of Green Belt are being proposed to be removed based on these inconsistencies. The lack of crucial evidence on the evidence base for the public to view and assess and the amount of incorrect information shows that there has been insufficient information to meet this legal criteria. The consultation periods for this and the previous consultation were unreasonably short for the amount of information that was being presented to the public. The Council has failed to respond to responses made and the evidence supporting those responses and failed to consider alternatives put forward. The Plan and consultation process do not meet the tests of soundness in NPPF paragraph 35. "Positively Prepared" – proposals have not been supported by objective assessments with inconsistencies in sustainability appraisals, and employment and housing proposals which have not stood up to objective challenge. No evidence has been submitted to substantiate that there is an unmet need from the Black Country, nor to justify the amount of overspill development now proposed in the Plan. The Plan does not adequately address infrastructure needs that would allow for sustainable development. The Plan is principally based on economic objectives and fails to give proper consideration to the social and environmental objectives required for sustainable development. "Justified"- the Council have failed to show that they have considered reasonable alternatives put forward in consultation responses. As many supporting evidence documents have not been made available to the public on the website, the Council cannot show that the evidence is proportionate. "Effective" –especially bearing in mind the impact of Covid, and historical development rates, the Council have not shown that the high housing growth proposed and employment development anticipated, is deliverable within the Plan period. No statement of common ground has been submitted. "Consistent with national policy" – the Plan does not comply with NPPF policy nor with guidance in Government Guidance Notes on Plan Making and Sustainability Appraisal. This includes failure to consider alternatives, failing to justify exceptional circumstances for removal of Green Belt and failure to provide a Council evidenced response to consultation comments.</p>
A0633	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document [Part 2]	No	No	No	<p>The Plan fails to comply with the Council's Statement of Community involvement. In particular, they have not complied with the community involvement processes and have not shown how the public's views have been incorporated nor how the responses have influenced plan development. The Council have failed to submit a Statement of Common Ground with either the Draft Reg 18 Pre Submission Plan when a Black Country Overspill for housing was proposed, nor with the current Reg19 Plan when additional employment overspill is proposed. This is contrary to the requirements of NPPF paragraph 27 and Planning Guidance Plan Making paragraphs 009 and 020.</p> <p>Whilst it is noted that statements should be succinct, because of the extent of non-compliance with the law, policy and guidance, the fact that the Council have failed to respond to objections raised in previous consultations, and the fact that no further submissions are allowed, it is considered essential that a fully detailed case be put to the Inspector. This shows that objections are fully referenced to supporting legislation and case law, planning policy, and Government guidance set out in its Plan Making and Sustainable Appraisal guidance notes. It also shows that all objections have been supported with detailed technical reasons, none of which have been responded to by the Council contrary to the law, the NPPF, Government guidance and the Council's own Statement of Community Involvement. Without this detailed supporting evidence set out in Appendix 1, it is not considered that the Inspector can properly assess the legal, procedural and soundness issues that have been raised.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0633	B001	N/A	<p>Noted. Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>The Council also considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.</p>	No
A0633	B002	N/A	<p>Shropshire Council considers a proportionate and robust evidence base has been prepared to inform the Local Plan Review. Specifically with regard to the proposed housing and employment land requirements, this includes such evidence as a Viability Study, Local Housing Need Assessment, Strategic Housing Market Assessment, Five Year Housing Land Supply Statement, Place Plans and Strategic Infrastructure Implementation Plan, Economic Development Needs Assessment and Employment Land Review.</p> <p>Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>The Council also considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0633	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S2	No	No	No	Housing – the total requirement figure should be 25,000 to reflect the housing need and the 1,500 proposed Black Country overspill deleted. There is no sound evidence to justify such a large increase over need, it will be difficult to justify that this can be delivered as sustainable development, previous experience in the County shows that failure to deliver housing resulted in greenfield and Green Belt land having to be released and with the impact of Covid, a cautious approach to development should be taken at present. The Plan will be reviewed before 2038 and this will be the opportunity to assess the impact of Covid and adjust development in the Plan above need if justified at that time. The Black Country Plan and supporting evidence is at an early stage so there is no justified evidence to support the need for such a large overspill to be allocated in Shropshire. The allocation also fails to take account of recent Government policy and financial support to the use of Brownfield sites which could now meet this housing need in the Black Country.
A0633	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Not specified	No	No	No	Employment – there needs to be a consistent employment figure in the different sections of the Plan and the 30ha proposed overspill allocation from the Black Country should be deleted. There is considerable inconsistency in the figures provided in the Plan varying from 300ha (policy S2) to 376ha (allocation total in settlement policies) to 414ha (Appendix 6 total for settlements) and this excluding employment proposed at RAF Cosford. The 300ha originally proposed to meet the County’s own need to balance housing has also been reduced to include 30ha of Black Country overspill. In view of the impact on release of greenfield and Green Belt land and to evidence that proposals can meet sustainable development, a clear and consistent employment figure is essential for the Plan to be considered sound. The Plan needs modification to ensure that the employment figure given in this policy equates to the total employment figures in the settlement policies and then to the employment figures for settlements given in Appendix 6. The Black Country Plan and supporting evidence is at an early stage so there is no justified evidence to support the need for any overspill to be allocated in Shropshire. The allocation also fails to take account of recent Government policy and financial support to the use of Brownfield sites which could now meet this employment need.
A0633	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S12, S13 and S14	No	No	No	Draft Policies S12, S13 and S14 allow for unrestricted economic developments outside settlements are considered superfluous as they would give carte blanche approval to economic development in a wide area outside established settlement areas, undermining the status of Green Belt and Safeguarded Land protection and stated reasons for allowing removal of Green Belt in the Plan. The policies as worded give no certainty or assurance to the public on what development can be expected for their area in the Plan and as such are contrary to policy and unsound. The proposed revised policy would still enable such economic development to take place but give a higher degree of justification and give the public the opportunity to input before any such decision was taken which would not be the case with the policies as worded.
A0633	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	No	No	No	Appendix 3 of the Plan states that “Key” evidence supporting this policy are Estate Plans prepared and in preparation and sustainability appraisal. However, no such estate plans are on the supporting evidence base and when challenged on this, in an e-mail of 20th January, the Planning Officer confirmed that “no estate plans have been prepared and agreed”. Also, as there are no sites proposed, there can be no sustainability appraisal to support this policy. The inclusion of this policy is unsound with no evidence to support its inclusion. There is no reason why any proposals by an Estate could not be considered as and when they arise under the other policies of the Plan. By approving a “long term vision and objectives” which by definition may not be development specific, could allow for a degree of future flexibility that would prejudice the public’s ability to have a say on a specific development proposal, as a decision in principle would already have been allowed. There were many objections to a proposal from Bradford Estates for a Garden Village in the Green Belt at Junction 3 of the M54. The Council have not included this proposal in the Plan, but by including this policy, it would allow the same proposal to be submitted as being in accord with this policy, overriding Green Belt policy concerns and the public’s involvement in major development proposals. The policy by favouring a small section of the community – large landowners at the behest of all other landowners in the County – is an unfair and unequal policy contrary to equality legislation.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0633	B003	the total requirement figure should be 25,000 to reflect the housing need and the 1,500 proposed Black Country overspill deleted.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p>	No
A0633	B004	<p>The Plan needs modification to ensure that the employment figure given in this policy equates to the total employment figures in the settlement policies and then to the employment figures for settlements given in Appendix 6.</p> <p>The Black Country Plan and supporting evidence is at an early stage so there is no justified evidence to support the need for any overspill to be allocated in Shropshire. The allocation also fails to take account of recent Government policy and financial support to the use of Brownfield sites which could now meet this employment need.</p>	<p>Shropshire Council considers that the proposed development strategies for each settlement are appropriate, effective, sustainable and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Identification of proposed site allocations and where relevant safeguarded land has been informed by a proportionate and robust site assessment process.</p> <p>In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p>	No
A0633	B005	Delete reference in these policies to allowing development outside settlements on green field and Green Belt land and delete inclusion of RAF Cosford as a Strategic Site. Replace with a general economic policy stating that any windfall/significant development that cannot be accommodated within a settlement would be considered on its own merits having regard to the need for the development, the availability of alternative sites and other development policies in the Plan specifically relating to sustainable development, climate change and any protected status of the land.	Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt including land at Shifnal proposed to be allocated for employment development and land proposed to be safeguarded for consideration in future plans for the growth and development of the town.	No
A0633	B006	Delete. No evidence has been submitted to justify this policy.	<p>Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal.</p> <p>Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0633	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15 Shifnal	No	No	No	Having regard to the potential windfall sites in the town, the percentage of windfall allocations in other settlements and to avoid pressure to release Safeguarded Land/Green Belt in the future to meet unmet windfall allowance, the existing figure is excessive. NPPF paragraph 70 states that “where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. The Council have failed to provide any evidence, let alone “compelling” evidence to justify such a high proportion of windfall allowance and so their proposal is unsound as being contrary to national policy. The Plan does not indicate size or proposed densities of the allocated sites, and from assessments there are differences in both site size and housing densities proposed between this Plan, previous consultation plans for the same sites and other evidence documents such as the Green Infrastructure Plan. As sites allocated will impact on the amount of land required to be taken out from Green Belt and Safeguarded Land, it is essential for the Plan to be considered sound that accurate figures are provided and justified, which is not the case here. A detailed assessment of these sites showing these inconsistencies is given in the attached Appendix1. In summary, with a revised windfall allowance of 48 results in a requirement for allocating 274 houses. Site SHF013 is stated as being 3.87ha on the SLAA as assessment. On the Preferred Sites consultation plan, all housing sites for Shifnal were given a density of 28.57 dwellings/ha. This gives 111 houses for the site. However, no justification has been given in any of the consultation plans for the density of housing proposed for any allocated site. Government policy is to make efficient use of land with increased densities wherever possible with 30 dwelling/ha being a more realistic figure for sites in Shifnal. This gives a figure of 116 houses. Site SHF022 is given as 1.74ha in SLAA: SHF023 in total is given as 13.99ha in SLAA with the Plan saying that the part proposed for Safeguarded Land as 10.4ha leaving 3.59ha as the remaining allocated for housing – the total for the allocated SHF022/pt. SHF023 is, therefore 5.33ha. At a density of 28.57 dwelling/ha gives a figure of 152 and with a more appropriate 30dwg/ha gives 160 houses. For the two sites at 30dwg/ha gives a total of 276 so not requiring the allocation of site SHF015/SHF029.
A0633	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15 Shifnal	No	No	No	The subsequent increase to between 39-41ha (there is inconsistency in this Plan and previous consultations on exact figure – see Appendix 1 for evidence) is not based on evidence to justify the release of so much land from the Green Belt. The reasons given for the huge increase on that originally proposed do not stand up to scrutiny as the net built floorspace argument was already built into the County wide employment total required and so is double counting when applied here. Similarly the size of buildings reason is no different to that proposed for other settlements where no such increase has been proposed. The Council has double counted the alleged reasons for increasing the figure so these cannot be considered as justifiable exceptional circumstances and so are contrary to NPPF Green Belt policy. Past decisions of the Council on releasing employment land for housing, the Council’s own Employment Land Review (which is part of the evidence base), allowing 1100 houses in the town without requiring any employment land and past history of employment take up rate, plus the current doubts on the future of economic development resulting from the impact of Covid-19, are detailed evidence to support the originally proposed figure. The proposed alternative has a lower negative sustainability appraisal score, is a more sustainable site on the SLAA assessment of sites, and has a lower Green Belt harm rating. In particular, SHF018d was originally proposed by the Council without carrying out any sustainability appraisal of the site as required by law and policy, and has a High harm score in the Green Belt Review Assessment (included in the evidence base) despite the Plan stating that the combined site only has Moderate-High harm, which is incorrect. No evidence has been submitted to show why the “reasonable alternative” site has not been considered as being appropriate and so the requirement that there be exceptional circumstances to remove SHF018b/SHF018d from the Green Belt has not been met. The allocation of the proposed site rather than SHF018a is contrary to the NPPF on Green Belt, the law and policy on sustainable development and sustainability appraisal, and the legal requirement for reasonable alternatives to be considered and reasons given to show why those alternatives were not selected

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0633	B007	<p>Amend windfall allowance from 30% of 322 housing required to be allocated (92 houses) to maximum 15% (48).</p> <p>Delete housing site SHF015/SHF029 as allocated site. Modify plan to show size of sites and housing densities proposed</p>	<p>The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings including sites SHF015 &amp; SHF029 that will make an important contribution to meeting the housing needs of Shifnal and helping to conserve the important historical building of Beech House and its curtilage structures and land. These allocation complement the existing committed supply of 370 dwellings which will further complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021 subject to the delivery of the modest windfall allowance for the town. At current rates of development in Shifnal (at 200 dwellings/year) the windfall allowance represents a supply of housing land equal to only a 6 month period. The windfall allowance will allow for smaller developers to enter the market and for development to be delivered that may target the local market and so, it is considered important to sustain this windfall allowance in the draft Local Plan.</p>	No
A0633	B008	<p>Revise employment figure to 16ha (14ha new) as originally proposed at Preferred Scale and Distribution consultation.</p> <p>Delete SHF018b/SHF018d as allocated employment site and allocate SHF018a/P14 as allocated employment site.</p>	<p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. . Development guidelines for sites released for development will ensure the site design, layout and landscaping respects the character and significance of adjoining land uses. In the Green Belt, this is required to strengthen the boundary to the urban area to help maintain the openness and permanence of the Green Belt around Shifnal.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0633	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15 Shifnal	No	No	No	If it was considered that additional Safeguarded Land required to provide choice and flexibility in the future, then SHF032/pt. SHF 018c would be more sustainable than Lodge Hill proposals, as closer to schools, employment area and town centre car park. The justification for removing the SHF017 and P16 (Lodge Hill) from the Green Belt does not stand up to scrutiny as evidenced in detail in the attached Appendix 1 statement. It is noteworthy that the Council have failed to respond to any of these detailed objections or to rebut them in any way. The fact that the Council have allocated this Safeguarded Land for specific development is inconsistent with such land allocated in other Green Belt settlements, contrary to NPPF Green Belt policy and failing to consider reasonable alternatives is contrary to the law. The alternative proposals are in more sustainable locations and their removal from the Green Belt would have less harm, especially as they would not see a significant reduction in the narrow belt of Green Belt separating Shifnal from Telford which would be the result with the Plan's proposed allocation.
A0633	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 Cosford	No	No	No	The present Green Belt and SAMDev policies for the site have not prevented major development being permitted and taking place at both the military base and Museum, with no time delay. All the development proposals in the Plan could similarly be approved within existing policies so there are no new exceptional circumstances to now remove the site from the Green Belt. Such removal is, therefore, unsound. The Plan states that the only reason to remove the site from the Green Belt is to allow for the specific developments referred to in the Plan; but by also including the site as a Strategic Site would leave the land open for unplanned economic development completely unrelated to its military/museum functions. By including the site as a Strategic Site contradicts the exceptional circumstances given for removing the site from the Green Belt. If the site is removed from the Green Belt, then it should not be allocated as Strategic Site but solely proposed for the specific military/museum functions stated.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0633	B009	<p>delete SHF018a/P14 and allocate SHF018b as Safeguarded Land (SHF018d to remain in the Green Belt).</p> <p>delete SHF017pt/P16 (land between Park Lane and A4169) and SHF017pt (land between A4169 and railway line). Replace with allocated housing site SHF015/SHF029; P15a Upton Lane/Lamledge Lane (part of which is Sub Opportunity Area Sh-1a in Green Belt Review Assessment); P15b (north-west Upton Lane), part of Sub Opportunity Area Sh-1a (north-west of Windmill/East A464).</p>	<p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. . Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038.</p>	No
A0633	B010	<p>Delete removal of site from Green Belt and delete site being a designated Strategic Site. The site should remain in the Green Belt as was accepted by the Inspector on the previous Local Plan. Delete Air Ambulance site allocation. This site has now been granted planning permission for the stated use as an exceptional circumstance in the Green Belt. There are, therefore, no longer any exceptional circumstances to justify its removal from the Green Belt or indeed to require any allocation of the site. The proposal to also allocate the site as a Strategic Site would, for the same reasons as stated above for the rest of RAF Cosford, leave the site open for non-air ambulance development in the future, again undermining the stated reason for removing the site from the Green Belt. The proposal to remove the site from the Green Belt and allocate as part of the Strategic Site would be contrary to NPPF Green Belt policy as there are now no exceptional circumstances to justify such removal, and so is unsound.</p>	<p>Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0634	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP24	Yes	No	Not Specified	<p>The definition of major development in Annex 2 of NPPF is excepted by footnote 70 specifically with regard to paras 172 and 173 of the Framework – para 172 being the AONB policy. This definition does not therefore apply universally for development within AONBs, though it may be used as a guide. The policy needs to make provision for developments falling outwit this definition to be classed as ‘major’, which could be smaller developments than those in the NPPF definition.</p> <p>The AONB Management Plan on p33 sets out some criteria to guide judgements of whether a development affecting the AONB is major, and these should be referenced in the policy.</p> <p>The footnote 55 within NPPF states “For the purposes of paragraphs 172 and 173, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”</p> <p>The fact that this says “ whether a proposal is major development... taking into account its nature, scale and setting”, etc suggests that a blanket application of the standard NPPF definition is not acceptable, since this cannot ‘take account’ of the particulars of the case.</p>
A0634	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP24	Yes	No	Not Specified	<p>Policy para 4 refers to development outside the designated area, but makes no reference to the ‘setting’ of the AONB. This is the established terminology in relation to development outside an AONB, as within the most recent Management Plan Policy P1 viii) and National Planning Practice Guidance: Natural Environment</p> <p>How should development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty be dealt with?</p> <p>Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.</p> <p>Paragraph: 042 Reference ID: 8-042-20190721</p> <p>Revision date: 21 07 2019</p> <p>At present the Local Plan does not address this element of guidance.</p> <p>It is notable also that that one of the amendments currently being proposed to the NPPF in consultation by government is also to make explicit reference to the setting of AONBs.</p>
A0634	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP26	Yes	No	Yes	<p>Given the clear importance during the period of the Plan of greatly increased capacity for renewable energy to address the Climate and Ecological Emergency and the urgent need to reduce carbon emissions to net zero, the Plan’s content on renewable energy arguably does not provide adequate policy guidance. Since such developments have the potential to be in conflict with the purposes of AONB designation, the lack of policy in this area puts the special qualities of the AONB at risk, while also increasing the likelihood of conflict between proposed developments and the AONB designation, with the knock on effect of slowing and making more expensive the delivery of new renewable capacity. Clear policy can help to prevent such conflicts and enable good levels of new renewable energy generation while protecting the AONB. There is within the Local Plan no real evidence of a strategy for renewable energy, such as what quantity of generation might come from what sources, or any discussion at all of areas, sites or locations. The Management Plan policy and guidance would in fact allow a modest degree of wind generation, though the Local Plan policy more or less prevents this, since Neighbourhood Plans are so limited in coverage. There is also no policy to guide planning applications for wind microgeneration in the AONB. The AONB Partnership believes it is possible to achieve a very substantial increase in renewable energy generation in Shropshire without harm to the AONB, but has felt obliged given its statutory remit to object to both large scale solar and biomass enterprises within the AONB.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0634	B001	<p>Remove “(as defined within Annex 2 of the NPPF)” and add suggested additional text: “Whether a proposed development constitutes major development will be a matter for the relevant decision taker, taking into account the individual characteristics and circumstances of the proposal and the local context. In determining whether a proposed development constitutes major development the Councils will consider whether by reason of its location, scale or massing, form, character or nature, the proposal has the potential to have a significant adverse impact on the natural beauty of the AONB. Criteria set out in the AONB Management Plan will be used as a guide. The nature of the AONB landscape means that even some smaller-scale proposals may be considered to be major development depending on the local context.”</p> <p>According to our understand of the National Planning Practice Guidance: Planning obligations, there is a further implication of the level that major development is defined at – as this determines for housing whether planning obligations can be sought from developers.</p> <p>Guidance on the question “Are there any specific circumstances where contributions through planning obligations should not be sought from developers?” states: “Planning obligations for affordable housing should only be sought for residential developments that are major developments.... In designated rural areas local planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Designated rural areas applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty.”</p>	<p>The Council considers it appropriate to use the definition of major development set out in the NPPF. This provides certainty and consistency for developers on the Council’s approach to development in the AONB. No change proposed.</p>	No
A0634	B002	<p>Add text “Development in the area around the AONB should be assessed for its impacts on the AONB itself, and also take account of the landscape quality of the setting of the AONB.”</p> <p>Add text to explanatory paragraphs “Measures to consider and mitigate such impacts should include where required Landscape and Visual Impact Assessments; care over orientation, site layout, height and scale of structures and buildings; consideration of the landscape, land uses and heritage assets around and beyond the development site; careful use of colours, materials and non-reflective surfaces; restraint and care in the and use of lighting.”</p>	<p>The Council considers that the requirements of this policy are consistent with current national planning policy and guidance and that as such, the proposed amendment is not appropriate or necessary. No change proposed.</p>	No
A0634	B003	<p>The Plan should set out a Strategy for increasing renewable generation capacity in the county while protecting other interests such as the AONB. The Strategy should consider the potential for different technologies and ideally give policy guidance to locating larger developments.</p> <p>Planning Practice Guidance Paragraph: 005 Reference ID: 5-005-20150618 states: “Identifying areas suitable for renewable energy in plans gives greater certainty as to where such development will be permitted. For example, where councils have identified suitable areas for large scale solar farms, they should not have to give permission outside those areas for speculative applications involving the same type of development when they judge the impact to be unacceptable.”</p>	<p>Any development proposals for renewable energy will be assessed against policy DP24 The Shropshire Hills AONB. The Council considers that the latter provides sufficient clarity and guidance on the protection of the special qualities of the designated area. No change proposed.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0634	B004	Habitats Regulations Assessment	Habitats Regulations Assessment 3.23-3.36	Yes	No	Not Specified	The analysis recognises the significance of agricultural activity in affecting the nutrient status of the river, but then goes on to focus almost exclusively on housing, with brief mentions of employment land. The existence within the catchment of intensive poultry units and anaerobic digesters with cumulative impacts including through changed land use, and the fact that these developments fall within planning control is not addressed at all. This would also include the impacts within Shropshire of such units which lie in Powys and Herefordshire. Incomplete assessment under HRA may make the Plan not sound. There are impacts which do not seem to be considered in adequate detail in Table 1 page 10-11 'Potential impact pathways.'. This table has a great deal of detail on fairly minor recreational impacts and very scant treatment of potentially significant indirect impacts such as manure from the millions of poultry raised in Shropshire. The full range of potential impacts associated with intensive poultry units should be addressed more explicitly within this section. The Appendix 2 tables SACs within the AONB (Table 14 River Clun and Table 20 Stiperstones & the Hollies) contain information which is out of date and incomplete. For example the River Clun SAC 'Site Vulnerability' section references fertiliser runoff due to poor practice but does not make a link with intensive poultry units. Both the tables mention Environmentally Sensitive Areas as a mitigation option, but this scheme closed to new applicants in 2005 and all agreements under the scheme terminated some years ago.
A0634	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	Yes	No	Not Specified	This policy does not adequately address the issue of large intensive livestock units, which have been the commonest form of major development within the AONB in the last decade. Most of these have been recommended for approval, in contrast to the 'exceptional circumstances' wording and tests within NPPF for major development in AONBs. The AONB Management Plan identifies this category of major development as a significant concern. Large intensive livestock units have also been an area of significant contention elsewhere in Shropshire and so should be addressed in this policy as well as relying on the AONB policy DP24. The soundness test of being positively prepared "meeting the area's objectively assessed needs" is arguably not met. Everything that is said about agricultural development in para 3c of SP10 comes under the preface "...will be positively considered..". As in NPPF, the geographically specific exception policies such as for the AONB effectively over-ride general policy presumptions in favour of certain types of development, but unless this is made clear the policies tend not to be interpreted this way and positive presumptions become a green light for 'anything goes'.
A0635	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP15	Not Specified	Not Specified	Not Specified	DP15 gives very limited recognition of the value of open space for informal recreation such as walking. We recognise that this can be provide by green infrastructure under DP14 policies. However, where green infrastructure provision is not possible (Policy DP15 5), it is important that some of the open space should include areas suitable for informal recreation such as walking.
A0635	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Not Specified	No	Not Specified	The Plan lacks a coherent policy for protecting and improving walking routes and promoting walking, within and between communities and in the wider countryside. The way the policies are written does not give a clear policy framework for pedestrian travel and the infrastructure it needs. In particular it lacks clarity with respect to existing as opposed to new developments and travel between centres and hubs. The Plan has missed the opportunity to give a clear steer that investment in walking routes throughout Shropshire is needed to ensure sustainable development and a zero carbon economy and to ensure that the amount of active travel through walking increases. SP3 1d. (Active travel/Walking and cycling links). This policy relates only to new developments and to links from new to existing developments. Therefore it is inadequate to deliver transition to a zero-carbon economy across Shropshire. It does not specifically mention active travel in existing neighbourhoods nor between strategic/principal centres and community hubs.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0634	B004	Additional analysis of the impact of agricultural developments, and updating of references to current agri-environment schemes. This supports our contention (submitted on a separate form b) that the Local Plan has not adequately developed policy in relation to intensive livestock units and large scale agricultural developments.	The Local Plan does not allocate land for intensive poultry units or anaerobic digesters. These are dealt with through the Development Management process and as such Policy DP12 provides for a project level HRA. No change proposed.	No
A0634	B005	<p>This topic justifies specific policy development and background given its importance, and should not be subsumed within the broader policy SP10. The AONB Management Plan policy P5 on Agricultural Development has some material to draw on here:</p> <p>“vi) Criteria indicating that applications for intensive livestock buildings should be refused include where:</p> <ul style="list-style-type: none"> <li>• the scale of buildings would exceed the farmstead’s existing built footprint</li> <li>• proximity to existing sheds would create significant cumulative impacts</li> <li>• location is proposed in open field locations away from other farm buildings</li> <li>• significant earth-moving or bunding is proposed</li> <li>• the topography means that the development will be easily visible</li> <li>• harm to landscape character cannot be satisfactorily mitigated</li> <li>• proximity to residential properties or other businesses (within 400m has potential to generate harmful impacts on amenity, as recognised in the restriction in this zone for agricultural permitted development)</li> <li>• units would be accessed by narrow roads and/or heavy traffic movements would alter the character of rural lanes or damage hedges or verges.” <p>Other key issues are around airborne nitrogen, waste materials especially in relation to the water environment, the physical landscape impact of large buildings, noise and odours, and associated traffic.</p> <p>Farming is vital to provide food, and this will involve some built development. However unsustainable forms of farming are now widely understood to be a key contributor to the Climate and Ecological Emergency, yet the Plan does not really acknowledge that agricultural developments can cause harm. The Plan should actively encourage sustainable forms of farming (with explanation) as is done for other sectors of economic activity such as tourism.</p> </li></ul>	<p>Noted. It is considered that the approach set out in SP10 is appropriate. Policy SP10 specifies that for positive consideration of agricultural proposals should ‘maintain or enhance countryside vitality and character’ and comply with all other relevant policy. Additional requirements are identified for large scale new development, with separate criteria for agricultural developments and other particularly relevant policies, including that relating to the AONB, signposted.</p> <p>The draft Shropshire Local Plan has to address a wide range of issues and requirements and is intended to be read as a whole . Therefore, in addition to the criteria set out in Draft Strategic Policy SP10, the relevant considerations of all other applicable policies will need to be taken into account in decision making on planning applications, along with other material considerations which can include other plans such as the AONB Management Plan which is directly referenced in draft Policy DP24.</p>	No
A0635	B001	Policy DP15. 5 Relating to where green infrastructure provision cannot be achieved. This should be amended to state that “open space provision should aim to include areas of natural greenspace for informal recreation such as walking and should be located appropriately within the site in order to offer the best opportunity for access to all residents”	The Council considers that all open space provision within development will be publicly accessible and that therefore, there is no need to specifically reference opportunities for walking.	No
A0635	B002	Policy SP3 1d should be extended to cover active travel in existing neighbourhoods, and between strategic/principal centres and community hubs and therefore fit with policy DP28 3b.	The need to reduce traffic and encourage alternative travel options is a theme running throughout the Plan. There is an emphasis on the location of new development in existing urban centres, the wording of many policies supports pedestrian and cycling options and the Sustainability Appraisal and site assessment process contain criteria aimed at minimising car-based travel and encouraging walking and cycling. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0635	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Not Specified	No	Not Specified	The Plan lacks a coherent policy for protecting and improving walking routes and promoting walking, within and between communities and in the wider countryside. The way the policies are written does not give a clear policy framework for walking for health and leisure and the infrastructure it needs. Policies lack clarity in their application and do not recognise that the local footpath network is a key part of community infrastructure to achieve active and healthy lifestyles. The Plan has missed the opportunity to give a clear steer that walking is a key element in achieving active lifestyles. Policy SP6. Health and Wellbeing. The only policy in SP6 relating to walking or walking routes is Policy SP6 7 (NB the numbering is incorrect in the consultation draft, this is the first No 7) relating to "safe and well-lit high quality walking and cycling routes". The policy needs clarifying – does it just apply to routes within (?new) settlements or possibly just to destinations? Despite the fact that local footpath routes are a very important part of community infrastructure that promotes healthy and active lifestyles (SP6 5a) they are not mentioned within SP6 5a which only relates to "facilities". There is no policy relating to protecting, improving and promoting footpath infrastructure and Rights of Way in the countryside.
A0636	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Legal Compliance - General	No	No	No	Council should respond to the following issues before proceeding to approve and submit the Submission Local Plan to the Secretary of State. The issues to be addressed are: (1) the inadequacies with the evidence base used to inform this review process; (2) the methodology applied when calculating Shifnal's employment need, (3) justification on how other sites in Shifnal were ruled out in the sustainability appraisal and (4) the heritage assessment used to inform their site selection process and (5) why SC has chosen to take on the overspill of employment and housing development required by the Black County.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0635	B003	An additional policy is needed in SP6 to protect and improve the footpath network to connect the countryside with settlements and to promote walking for active lifestyles. Alternatively the Policy SP6 5a relating to community infrastructure should be expanded to include local footpath networks. Policy SP6 first7 needs to be amended to clarify what it applies to.	The Council considers that the need to encourage alternative travel options is a theme running throughout the Plan and is given particular emphasis in Policy DP28: Communications and Transport in relation to the Hierarchy of Sustainable Transport. The Local Plan places an emphasis on the location of new development in existing urban centres and the wording of many policies supports pedestrian, cycling and other sustainable transport options. No change proposed.	No
A0636	B001	Council should respond to the following issues before proceeding to approve and submit the Submission Local Plan to the Secretary of State. The issues to be addressed are: (1) the inadequacies with the evidence base used to inform this review process; (2) the methodology applied when calculating Shifnal's employment need, (3) justification on how other sites in Shifnal were ruled out in the sustainability appraisal and (4) the heritage assessment used to inform their site selection process and (5) why SC has chosen to take on the overspill of employment and housing development required by the Black County.	Shropshire Council considers that a proportionate and robust evidence base has been prepared to inform the draft Shropshire Local Plan. Shropshire Council also considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Comments on the Sustainability Appraisal (SA) noted. Proposed changes to SA would have no material effect so are not considered necessary. Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.	No



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A0636	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Legal Compliance - Gunning Principles	No	No	No	Common Law imposes specific requirements on public consultation through R.V Brent LBC Ex p. Gunning {1985} 4 WLUK 200 which set four legal principles for consultations to be legal (known as the Gunning Principles). These are that (i) Plans must be at a formative stage before a final decision has been made or pre-determined by the decision maker. the Council have not published consultation responses following the Regulation 18 Plan prior to publishing the Regulation 19 Plan and no written responses have been prepared to permit the public and elected local representatives to consider the arguments for the Regulation 19 Plan. This is considered to imply that the proposals in the Regulation 18 Plan were not at a formative stage and the Regulation 19 Plan has already been pre-determined including the employment land allocations in Shifnal. The Council have not responded to inconsistencies in the recording of the hectarage of land for SHF018b and SHF018d suggesting the figures used to release Green Belt land are not based on sound evidence contrary to the Gunning principles. Council also advertised RAF Cosford and SHF018b/SHF018d as potential development sites outside of the Green Belt prior to the strategic sites consultation where the sites were proposed for release from the Green Belt suggesting the Council had predetermined their strategic sites which is re-enforced by the lack of response to objections and queries following the consultation. (ii) There is sufficient information to give 'intelligent consideration' to the information provided. A number of evidence documents are missing, incomplete or out of date including the Local Transport Plan, Annual Monitoring Report, Tree & Woodland Strategy, Health and Well Being Strategy expires in 2021, no formal Estate Plans have been published to support Policy SP15, the Tourism Economic Impact Report is 2013, Landscape Characterisation Assessment is 2006. Information on the website, such as the proposed Local Plan period and the Local Development Scheme have not been kept up-to-date. There has been a lack of clarity over the hectarage of the employment allocations and the densities for the housing allocations in Shifnal, double counting in the calculation of the land area to be made available on the employment allocations which impacts on the release of Green Belt land. Inaccuracies in the Sustainability Appraisals. Therefore, how can the public be expected to judge the soundness of policies and proposals in the Plan, when crucial parts of the evidence are unavailable for the public to view. This is especially important when these proposals are likely to impact on the need to release Green Belt land. As well as going to the soundness of the plan and compliance with Government guidance, the failure to make accessible to the public evidence relied on by the Council, is contrary to the legal requirement in the Gunning case to permit intelligent consideration of accurate information bringing the soundness of the plan into question. (iii) There is adequate time for consideration and response to provide sufficient opportunity for consultees to participate in the process. There has been insufficient time through the review process with Regulation 18 Pre-Submission consultation permitting only 8 weeks during the summer holiday period. The Regulation 19 consultation was conducted in a similar manner over the Christmas period and national lockdown (addressed through an extension of the period) with libraries closed preventing access to the consultation documents that included matters affecting the whole County, 35 new policies referring to 50 evidence documents with appendices and a large number of new evidence documents contributing to the 11,000 page evidence base. In contrast, the Preferred Scale & Distribution of Development and Issues & Options Consultations that avoided holiday periods or the Preferred Sites and Strategic Sites consultation for just 4 sites that covered longer periods of 9 and 10 weeks. The period allowed was also reduced by the fact that several pieces of evidence quoted in the Plan were not put on the evidence base website at the start of the consultation period and nearly half was not put on the evidence base at all (this included the Infrastructure and Implementation Plan, Economic Development Needs Assessment, Transport Plan and Estate Plans) contrary to the statement on the Councils website on this consultation. This also contrasts with consultations on other public documents including a 12 week consultation on the revised Statement of Community Involvement that is 27 pages; 8 weeks for the Community and Rural Strategy that is 22 pages; and 12 weeks for the Cultural Strategy that is 33 pages. It is considered that this inconsistency is further evidence that this consultation is flawed and legally questionable. (iv) 'Conscientious consideration' must be given to the consultation responses before a decision is made. It is considered that the Council have not published evidence showing how consultation responses have been taken into account. The publication of a summary of responses does not demonstrate how feedback has been considered and how it has been incorporated into the next review phase or why the Council took decisions contrary to recommendations in the consultation responses.
A0636	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Duty to Co-operate	No	No	No	The duty to cooperate is a legal requirement for council's and statutory bodies to work together on strategic cross-boundary issues. In SC's case the county is adjoined by several local authority areas, and there are areas beyond this with a functional relationship, most notably the Black Country. As previously set out, there is no information contained in SC's evidence base which demonstrates why SC are proposing to include 1,500 dwellings to meet the Black Country needs. Without this key information being made publicly available, we cannot ascertain whether or not the duty to cooperate, under the Localism Act and NPPF has been conducted in an appropriate manner.
A0636	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Statement of Community Involvement	No	No	No	The Statement of Community Involvement (SCI) has not been regularly reviewed as required by Government guidance. The Council has also failed to comply with their SCI. The Town Council and local community have previously submitted detailed comments on locally relevant issues at each consultation stage, but SC have failed to respond to those concerns showing how they have taken those views into account or why they have not accepted them. This does not constitute effective or meaningful dialogue as the community involvement has been one way.
A0636	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Statement of Common Ground	No	No	No	Paragraph 27 of the NPPF sets out that 'authorities should produce, maintain, and update one or more statement(s) of common ground, throughout the plan-making process'. It goes onto state that 'such statements should be made publicly available throughout the plan-making process to provide transparency'. One of the tests of soundness is that a Plan must be effective and that cross-boundary matters that have been addressed are to be evidenced by the statement of common ground. This has not been demonstrated by SC and the current review process is unsound. As set out above SC are proposing to include 1,500 dwellings to meet the Black Country needs and no statement of common ground was submitted to accompany this consultation. Without this statement, there was no information on identified needs as required by paragraph 012 (reference ID: 61_024012-20190315) of the Plan Making guidance, for the public to understand the reasoning for this change. The NPPF requires that such statements should be provided throughout the preparation of the plan and not at the end. As members of the public have not been consulted on this, the evidence base is clearly flawed.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0636	B002	See summary of main issues.	<p>Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p>	No
A0636	B003	See summary of main issues.	<p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No
A0636	B004	N/A	<p>Shropshire Council strongly considers that it has met the requirements of the Statement of Community Involvement. The consultation process undertaken is also considered to comply with the Gunning Principles and national legislation.</p>	No
A0636	B005	N/A	<p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0636	B006	Sustainability Appraisal	Sustainability Appraisal	No	No	No	Shropshire Council failed to satisfy Section 19 of the Planning and Compulsory Purchase Act 2004(PCPA), Regulation 5(1) and Regulation 12 and Schedule 3 of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) and the European Directive 2001/42/EC in Recital 17 to use the environmental report to inform the Plan and generally in “the assessment of the effects of certain plans and programmes on the environment”. The Council also failed in relation to the Strategic Environmental Assessment and Sustainability Appraisal guidance note Paragraphs 002 to undertake an iterative process and Para 018 to consider all reasonable alternative sites and the reasons for setting them aside. The preparation of the Pre-Submission Plan is therefore legally flawed and unsound. This failure is endorsed by Seaport Investments Ltd 2002 NIQB 62 that there must be parallel development of the environmental report and draft plan. In Berkeley v SoS Others 2002 3 WLR & Save Historic Newmarket Ltd v Forest Heath DC (2011 EWHC 606, and Royal Brompton & Harefield NHS Foundation Trust v Joint Committee of Primary Care Trusts (2011) EWHC 2986, there must be an environmental statement in a single accessible format prepared from the start of the process and presenting relevant environmental information with a non-technical summary to assist potential consultees. The Sustainability Appraisal fails to properly assess sites against all scoping objectives especially proximity to public transport (SO6 incorrectly recorded as quality of agricultural land), reduction of CO2 emissions (SO12) and adaptation and mitigation to climate change (SO13). The SA used to inform the site assessments failed to assess these key Scoping Objectives in the Pre-Submission Plan and Strategic Sites consultation rendering the process not legally compliant and producing site selection decisions that are inadequate, incorrect and unintelligible under the Gunning Principles. Site SHF018d was also not included in the SA and not assessed individually or against reasonable alternatives including SHF018a with a lower sustainability scoring. This indicates a pre-determination of the selected sites contrary to the Gunning Principles requiring consultation at a formative stage before final decisions are made. The SA on the Preferred Scale and Distribution (PSD) consultation stage was prepared on the basis Shifnal would receive 16ha of employment land and would minimise the need for additional car based transport. The Preferred Sites (PS) stage increased the amount of employment land for Shifnal to 40ha, but the SA failed to assess public transport criteria and to assess the SHF018d individually or against alternatives. The Council cannot show the increase in employment from 16 to 40ha and the allocation of Shif18d for employment use, would be sustainable development as these matters were not appraised at the appropriate time. The SLAA Report 2018 did not present a map with sites boundaries and these boundaries could only be ascertained through a web-site search without any cross referencing in the SLAA report. There was no map in the SA for the public to identify the location and boundaries of sites appraised. Case law states that a disparate collection of documents traceable only by a person with a good deal of energy and persistence does not satisfy legal requirements on making documents available to the public.
A0636	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 - Housing	No	No	No	Policy SP2 requires, from 2016 to 2038, the provision of around 30,800 new dwellings at around 1,400 dwellings per annum. SC need to clarify the uplift of this housing target to 30,800 above the minimum 25,894 new dwellings required by central Government and above the demographic need of only 20,746 new dwellings. SC also need to explain why 1,500 dwellings for Black Country needs is also accommodated in the proposed housing provision despite their being no change to the standard methodology for most West Midlands local planning authorities except for Birmingham, Wolverhampton, Coventry and Stoke-on-Trent. The existing 'standard methodology for calculating housing requirements is based on the lower 2014-household projections (not the 2018 based projections) for both Shropshire and Telford & Wrekin which would permit SC to reduce their housing targets rather than increase them to 30,800 dwellings.
A0636	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 - Employment	No	No	No	Policy SP2 requires, from 2016 to 2038, around 300 hectares of employment land at around 14ha of employment land per annum. Appendix 6 of the Employment Land Supply states that the strategic employment land supply will be 414ha and it is unclear how this figure contributes to the employment land requirement nor why the two figures are different. The 300ha requirement is considered sufficient to deliver enough jobs to achieve a sustainable balance with their housing requirement but SC need to explain how this balanced growth projection was calculated. The proposed 30,800 dwellings and 300 ha of employment land seem disproportionate and as an example, guideline employment land figure for Shifnal was previously 16 ha but increased to 41ha in the Pre-Submission Draft SLP. SC indicate the 1,500 new dwellings proposed at Shifnal should equal circa 1,500 new jobs. Each job needs on average 42.25 sq.m of finished floorspace equal to 40% of the entire employment site. This means, an additional 40% needs to be added to the overall total. The calculation is 1,500 new dwellings x 42.25 sq.m of floorspace x 40% equal to 15.84 ha. For the figure to increase to 41ha, the 40% provided by SC appears to be already included in the balanced growth calculation of 16 ha.SC need to explain the methodology to calculate Shifnal’s employment need. The employment land supply figure identified by SC also fail to account for employment land proposed at RAF Cosford (Aviation Academy, 1500 additional military personnel; new air ambulance development). This additional land puts the actual employment land figure at +50% above the 300ha requirement and so, there is a clear over provision of employment land over the next plan period.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0636	B006	See summary of main issues.	The Council considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.	No
A0636	B007	The existing 'standard methodology for calculating housing requirements is based on the lower 2014-household projections (not the 2018 based projections) for both Shropshire and Telford & Wrekin which would permit SC to reduce their housing requirement from 30,800 dwellings.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0636	B008	The actual employment land available in the County +50% higher than the 300ha requirement and so, the employment land requirement may be reduced over the next plan period. The employment land guideline for Shifnal should also be reduced to 16ha.	In order to achieve the proposed employment land requirement, respond to the wider range of employment uses and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038. Shropshire Council also consider that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No

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A0636	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	No	No	No	Paragraph 7 of the NPPF sets out that 'the purpose of the planning system is to contribute to the achievement of sustainable development'. The draft plan has not been proactively prepared in accordance with the three overarching objectives, which help form sustainable development. Significant weight is placed on the economic objective for Shifnal and the wider district but very little on the social and environmental objectives. The proposed inclusion of 41 ha of employment land and 1,500 new dwellings in Shifnal will lead to substantial losses of Safeguarded Land and Green Belt eroding the natural green space between Shifnal and Tong. Contrary to paragraph 9 of the NPPF, the local circumstances, needs and opportunities for Shifnal are not considered and the proposed urban extension will have a detrimental effect on the surrounding landscape, road infrastructure, schools and health services. The proposed Draft Plan is therefore unsound. There is no recognition in the Pre-Submission Draft SLP of the potential impacts of Covid-19 on the local economy, including increased homeworking reducing the need for employment land. A more conservative estimate of the employment land requirements should be undertaken, with reconsideration of the requirement waiting until the next plan review, reassessing the economic situation when the full effects of Covid-19 can be assessed. Otherwise, there is a high likelihood that employment will not keep up with the high housing figure proposed and so balanced growth will not occur nor will sustainable development be achieved in accordance with Policy SP4.
A0636	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	No	No	No	Policy SP6 sets out that new development should ensure the health and well-being of individuals, communities and places. The location of Shifnal's employment land to the north east and future strategic housing to the south and west is contrary to the Neighbourhood Plan and the views of the local community on the future development of their town. A large proportion of Shifnal's existing and new housing stock south and west is split from the proposed employment land to the north east. The existing central railway line makes access from the south and west to the new employment land only achievable through the centre of Shifnal via the Market Place, Victoria Road, Braford Street and Aston Street junctions on a road network too constrained to carry the proposed increased transport movements throughout the town. This is assessed in 'Comments on the Effect on Traffic in Shifnal Caused by the Proposed Employment Land Development (Land off Stanton Road)'. In addition, the infrastructure improvements including highways improvements required by the recent inclusion of 1,100 new dwellings have yet to be implemented in Shifnal and Shifnal does not have the infrastructure or facilities to accommodate 41 ha of employment land and a further 1,500 new dwellings, in addition to the 1,100 new dwellings being built out. The employment and housing allocations are disproportionate to the existing settlement, fail to maintain or enhance the vitality of Shifnal and have a harmful impact on the social wellbeing of the local community, risking the erosion of community cohesion. SC must assess the proposed cumulative growth in Shifnal over this relatively short time from 2012 – 2021 and through the 2038 which will have a negative impact on social wellbeing and social cohesion within Shifnal contrary to Policy SP6.
A0636	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	No	No	No	SC concluded that exceptional circumstances exist for the release of Green Belt land without properly satisfying NPPF paragraph 137 to demonstrate that all other reasonable development options for meeting identified needs have been properly assessed. This omission affects land released for housing and employment uses on sites allocated for development to 2038 and also land safeguarded for future development. The evidence base for the Local Plan did not provide the reasons why other sites were rejected and did not consider other opportunities for industrial development within neighbouring Telford and the sub-region (Staffordshire, Wolverhampton, West Midlands etc) before changing the Green Belt boundaries around Shifnal. Shifnal Town Council suggested SHF018a as a more sustainable option than SHF018b/SHF018d to meet the employment needs of the town and no explanation was provided for rejecting SHF018a as safeguarded land. The land that is safeguarded is not justified in the evidence base, Sustainability Appraisal or Proposals Map. There is also conflict in Policy S15.1 between Point 4 which seeks to promote the local and sub-regional role and functions of Shifnal and Point 7 which protects the safeguarded land from development except in very special circumstances. These very special circumstances relate more to the sub-regional role of the town than to the local objectives in the Neighbourhood Plan which is a material consideration for the Local Plan. This also reflects an objective in the exceptional circumstances statement that Shifnal should perform the same role as Bridgnorth even though Shifnal is a smaller settlement, located close to the strategic centre of Telford. Shifnal is also expected to be influenced by development of the strategic site on the former Ironbridge Power Station. The release of Green Belt land for development and safeguarding cannot be justified as all reasonable options for development have not been assessed and exceptional circumstances for the release of this Green Belt land have not been properly identified.



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A0636	B009	A more conservative estimate of the employment land requirements should be undertaken, with reconsideration of the requirement waiting until the next plan review, reassessing the economic situation when the full effects of Covid-19 can be assessed.	<p>The draft Shropshire Local Plan seeks to achieve the sustainable development of Shropshire. All references to sustainable development within the draft Shropshire Local Plan recognise the three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). This is recognised within the introduction to the draft Shropshire Local Plan, which states "the pursuit of sustainable development is at the heart of the planning process" and that "achieving sustainable development will mean that decision takers must look at all facets of sustainability in arriving at decisions: economic, social and environmental. In all cases a balance of considerations is needed, and it is accepted this will often lead to a variety of opinions being expressed."</p> <p>The proposals within the draft Shropshire Local Plan have been informed by a comprehensive Sustainability Appraisal process.</p> <p>Draft Policy SP4 is not seeking to define sustainable development, rather it is providing clarity on how the presumption in favour of sustainable development introduced within the NPPF would apply, if relevant, in Shropshire.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Comments on the Sustainability Appraisal (SA) noted. Proposed changes to SA would have no material effect so are not considered necessary.</p> <p>With regard to the proposed safeguarded land, it is noted that the National Planning Policy Framework (NPPF) states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development".</p>	No
A0636	B010	Council must assess the proposed cumulative growth in Shifnal over this relatively short time from 2012 – 2021 and through the 2038 which will have a negative impact on social wellbeing and social cohesion within Shifnal contrary to Policy SP6.	The Council considers that there is no conflict between Policy SP6 and its strategy for Shifnal. The latter forms part of the overall approach to development in Shropshire which is aimed at achieving all facets of sustainable development, social, economic and environmental.	No
A0636	B011	See summary of main issues.	<p>It is understood that this representation primarily relates to the proposed strategy for Shifnal and not the content of draft Policy SP11. Issues raised relating to Shifnal are further addressed in the relevant settlement section.</p> <p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No

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A0636	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	No	No	No	Policy SP12 refers to the employment requirement to deliver around 300 ha of employment land throughout the plan period. The spatial strategy identified to achieve these objectives is also set out in Policy SP12. There is no explanation in this Policy nor in the description of the strategy to explain the reasons why proposed employment allocation SHF018d and SHF018b have been brought forward in Shifnal over other sites and SHF018a, in particular. This omission makes it difficult to establish whether the plan led approach is successful in protecting and improving areas of higher landscape value. In the evidence presented as part of SC's Highways Assessment, it is unclear why site 2- plots SHF018b & d are identified as having low or medium highways impact, whilst adjoining sites 1 and 3 are considered as having a high to very high highways impact. SC also need to clarify the methodology used for calculating Shifnal's balanced growth and resulting employment need.
A0636	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	No	No	No	Policy SP14 reiterates that development in the 'strategic corridors through the Green Belt or Shropshire Hills Area of Outstanding Natural Beauty will be subject to appropriate national and local policy. We consider that the proposed 41ha of employment land at Shifnal is at conflict with paragraph 137 of the NPPF, because exceptional circumstances to justify the Green Belt release in the area, has not been provided throughout the review process. The Pre-Submission Draft SLP refers to the role that Shifnal would play to provide strategic economic development in the M54 strategic corridor. The employment land proposed at RAF Cosford has not been included in the overall calculations to assess the need and it should be acknowledged that there is a plentiful supply of already committed employment land in neighbouring authorities in this corridor. It is an unsustainable assumption that Shifnal would attract such strategic employment development to justify the release of such large areas of Green Belt.
A0636	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	No	No	No	There is no justification for Policy SP15 to support the non-statutory plans of larger estate owners. The implementation of Policy SP15 would support the long-term vision and objectives of Bradford Estates to promote a new settlement at Tong providing support in principle for a development not currently proposed in the Local Plan housing requirement or housing supply projection. This would prejudice the ability of the public to comment on the specific development proposal and to influence the degree of future flexibility in permitting further development. This is despite the intention to have "meaningful public consultation" which could be open to wide interpretation depending on the point of view of the promoters or planning authority etc. Accordingly, there is a concern that Policy SP15 allows Bradford Estates to promote this scheme without any justification for the special privileges given to larger landowners in the County. SP15 prejudices the community against larger landowners which can be argued as being contrary to the Equality Act.
A0636	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17	No	No	No	The strategic housing and employment allocations in Shifnal do not conform with Policy DP17 because they are not properly assessed against other sites in the Sustainability Appraisal nor are reasons given for rejecting alternative sites contrary to Section 13 of the NPPF (Protecting Green Belt Land). The Sustainability Appraisal (pages 91 – 96) finds Sites SHF018b and P15b score poorly for overall sustainability and much of the proposed 'safeguarded land also gets lowish scores but are included in the proposed sites. The extension east of Upton Lane (SHF018d) is contrary to national policy, as no exceptional circumstances are provided for its release. SC do not correctly apply the findings of the Green Belt Review Assessment to SHF018d which constitutes an unacceptable encroachment into the countryside, with no recognisable, permanent boundary, causing High Harm to the Green Belt and extending east of Upton Lane which is a clearly defined Green Belt boundary. This indicates no exceptional circumstances for this land release given the availability of alternative sites causing Less Harm particularly SHF018a now proposed as safeguarded land. SC state the Green Belt land releases for employment use (SHF018b and SHF018d) are of Moderate to High Harm but land east of Upton Lane has a High Harm to the Green Belt and landscape. SHF018d is part of Broad Area 29 In the Green Belt Review containing the proposed MAAC site intended to be removed from the Green Belt further causing moderate to high harm with no justification for these Green Belt land releases.
A0636	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP21	No	No	No	Policy DP21 sets out that, "the safeguarding of people and property and mitigation of the effects of climate change, will be achieved by directing development to areas at least risk of flooding". SC's Strategic Flood Risk Assessment sets out that the majority of Shifnal is located within Flood Zone 1, with the area immediately around the Wesley Brook located within Flood Zones 2 and 3 (1 being low risk and 3 being high). This report has also identified that Shifnal has one of the highest surface water flood risks in the county and would be the most vulnerable to cumulative increases in flood risk due to new development. With most of this risk coming from Wesley Brook being a source to its confluence with River Worfe. In accordance with paragraph 157 of the NPPF it should be noted that the Sequential and Exception Test of Shifnal's proposed allocated sites in the Pre-Submission Draft Local Plan does not fully recognise Shifnal's identified surface water flood issues.
A0636	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23	No	No	No	To date no strategic plan has been presented to illustrate how the Development Strategy for Shifnal will ensure the historic character of the town will be preserved or enhanced after the towns proposed extension in accordance with the objectives of Policy SP23. Evidence for the strategic allocations advised that heritage assessments were produced to inform the site selection process but it remains unclear as to how the historic environment was considered in the evidence base or from the Sustainability Appraisal contrary to Paragraph 185 of the NPPF which would question the soundness of the Plan. The Landscape and Visual Sensitivity Assessment also confirms the majority of parcels have visual and landscape sensitivity issues for existing landscapes, listed buildings and conservation areas. The allocations will change the appearance of the historic character of Shifnal, there will be intensification of traffic flows through the centre of Shifnal which is a factor that Historic England regards as affecting historic towns with development of transport infrastructure also affecting historic landscapes and damaging heritage assets.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0636	B012	Policy SP12 refers to the employment requirement to deliver around 300 ha of employment land throughout the plan period. The spatial strategy identified to achieve these objectives is also set out in Policy SP12. There is no explanation in this Policy nor in the description of the strategy to explain the reasons why proposed employment allocation SHF018d and SHF018b have been brought forward in Shifnal over other sites and SHF018a, in particular. This omission makes it difficult to establish whether the plan led approach is successful in protecting and improving areas of higher landscape value. In the evidence presented as part of SC's Highways Assessment, it is unclear why site 2-plots SHF018b & d are identified as having low or medium highways impact, whilst adjoining sites 1 and 3 are considered as having a high to very high highways impact. SC also need to clarify the methodology used for calculating Shifnal's balanced growth and resulting employment need.	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. It is considered that an employment land provision at Junction 3 of the M54 Motorway is not required during this Plan period to 2038. The employment policies SP12, SP13 and SP14 would still be sufficiently flexible to accommodate such an outcome in the event that the circumstances determining the strategy for the Local Plan were to change considerably during the Plan period.	No
A0636	B013	See summary of main issues.	Shropshire Council has undertaken a robust and proportionate site assessment process to inform the identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt including land at Shifnal proposed to be allocated for employment development and land proposed to be safeguarded for consideration in future plans for the growth and development of the town. The draft Local Plan should seek to achieve sustainable development for those areas where a planned strategy is presented in the Local Plan including Shifnal. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered to be appropriate for the draft Local Plan to address the need for new employment to be generated in Shifnal within the planned strategy for the town.	No
A0636	B014	There is a strong objection to policy SP15 and its potential interpretation which may prejudice the future protection of the Green Belt and public participation on future development proposals and the Council must address the omission of the Estate Plans in the Local Plan evidence base by making them available on the public.	Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal. Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.	No
A0636	B015	See summary of main issues.	Policy DP17 requires development proposals to assess their impact on landscape and visual amenity and will apply to any planning applications on sites SHF018b, P15b and SHF018d. The principles behind policy DP17 have been applied through the Sustainability Appraisal and Site Assessment process which considered the landscape and visual sensitivity of all SHLAA sites based on the Council's Landscape and Visual Sensitivity Study.	No
A0636	B016	See summary of main issues.	The application of the Sequential and Exception Tests to all proposed site allocations is based on the information contained in the Council's Strategic Flood Risk Assessments (Levels 1 and 2) and follows national planning policy and guidance. As such the Council considers it is accurate and appropriate.	No
A0636	B017	The heritage assessments informing these decisions should be published to show the mitigation for the future conservation and preservation of heritage assets in Shifnal town centre.	Policy DP23 will ensure that heritage assets in Shifnal are safeguarded in response to development proposals. The Sustainability Appraisal and Site Assessment process considered heritage assets throughout and the results are available on the Council's website. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0636	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP25	No	No	No	Shifnal has limited investment in infrastructure (including roads and footpaths, new medical centre, education and leisure facilities) to support the expansion of the town despite the recent 1,100 new dwellings recently approved and currently being built out, resulting in some 40% increase in the town's population. The Pre-Submission Draft SLP paragraph 5.215 highlights that the future housing extension to south and west of the town which is safeguarded) will provide improvements at Five Ways and Innage Road. However, S106 funding has already been obtained from developers of recent large housing developments for improvements to Fiveways to meet the increased traffic needs of the town. Further to this, no practical infrastructure improvements have been identified to accommodate the proposed growth of the town.
A0636	B019	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Shifnal Town Strategy	No	No	No	Council need to present evidence to justify the release of Green Belt land for safeguarding for future development beyond 2038 to the east, south and west of Shifnal. This designation implies the principle of development on this land is accepted despite the community not being consulted on this prior to including the land the Plan. The safeguarding of this significant area of land will also place further strain on Shifnal should the County be unable to demonstrate an adequate housing land supply in the short to medium term. Council need to justify the reason for considering Green Belt policies in the event that an earlier development proposal was considered for the safeguarded land under very special circumstances and whether the development of the land would be afforded the same weight as Green Belt land. Council need to demonstrate the very special circumstances for the release of allocations SHF018b and SHF018d and show that this omission will not provide a precedent for the release of further safeguarded land in a future review of the Local Plan. Council also need to have regard to the conservation of the historic character of Shifnal and make available any submitted heritage assessments to illustrate the proposed mitigation of to conserve and enhance the historic character of the town. The Local plan also needs to recognise the underlying consensus of the local community set out in the objectives of the Shifnal Neighbourhood Plan that any development should retain the small market town character as a principle attraction of the town. Council should justify the large release of Green Belt land which are contrary to national policy including paragraph 006 of the Planning Policy Guidance and which undermine the Shifnal Neighbourhood Plan. It is recognised that the Neighbourhood Plan only goes to 2026, the principle issues brought forward by the community and underpinning the Plan, are still relevant and should be reflected in the Local Plan proposals. The proposals are clearly a significant departure from the Neighbourhood Plan and the community and Shifnal Town Council has understandably raised the question about whether their efforts to produce the Plan were worthwhile. If the proposals were to go ahead this would naturally cause a great deal of local resentment. Council take into account both Market Drayton and Broseley Neighbourhood Plans, while Shifnal's Plan has not been acknowledged. We would like to understand why this is the case.
A0636	B020	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Shifnal: SHF018b/SHF018d - Traffic Impacts	No	No	No	The proposed employment development land located off Stanton Road will create a substantial increase in traffic on Stanton Road and Aston Street even if commercial vehicles could be effectively restricted from using this route. The main commercial centre in East Shropshire is Telford, which lies to the west of Shifnal, and Aston Street is the direct route to Telford from the proposed development. Vehicles wishing to access and egress from the west will use the Aston Street / Stanton Road route as it is more than 8 kilometres shorter than the A41 / M54 route to Junction 4 of the M54. The A41/Stanton Road junction is also a site of morning and evening stationary traffic for vehicles trying to travel in the direction of the M54 Stanton Road and Aston Street are not suitable for carrying the additional volume and increased unit weight of the generated traffic because: (1) The junction with Bradford Street and the A464 trunk road is already well beyond capacity and causes substantial delays and congestion at peak periods. Proximity of buildings within the Shifnal conservation area preclude any opportunity of additional land take for upgrading. (2) The turning movements at this junction currently disrupt traffic flows on both the A464 and the A4169. (3) The existing carriageway is narrow (6 metres) and cannot be widened due to the proximity of buildings. (4) The existing carriageway construction is not engineered and is not capable of taking additional and heavier traffic. It is currently in a poor state of repair. (5) The station approach and the main shopping car park access onto Aston Street, both junctions having severely impaired sight. (6) Aston Street residents are obliged to park on Aston Street causing single line traffic flows as there is no access to the rear of their properties. (7) Aston Street dwelling doorways access directly onto the pavement, and the increase in noise, dust and vibration will be detrimental to their environment. (8) The Bradford Street/ Aston Street junction is crossed by the principal walking route to the train station from the town centre including provision for those with impaired sight and wheelchair users. (9) The existing pedestrian footpaths at the junction are narrow and hazardous.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0636	B018	The Council need to acknowledge the infrastructure needs of the community and their concerns at the infrastructure capacity of the town and where and when further infrastructure investment will be provided in advance of further developments in Shifnal.	The infrastructure needs of Shifnal will be taken into account through the Strategic Infrastructure Implementation Plan and Place Plan process.	No
A0636	B019	Council should not remove the proposed safeguarded land from the Green Belt and should instead demonstrate the very special circumstances for the release of land for further development. The Council should also publish any submitted heritage assessments to illustrate the proposed mitigation to conserve and enhance the historic character of the town should any land be released from the Green Belt for development.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. . Development guidelines for sites released for development will ensure the site design, layout and landscaping respects the character and significance of adjoining land uses. In the Green Belt, this is required to strengthen the boundary to the urban area to help maintain the openness and permanence of the Green Belt around Shifnal. On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038.	No
A0636	B020	See summary of main issues.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038. It is recognised that whilst housing development may cease on the completion of the proposed 1,500 dwellings, it is proposed that employment development will commence at an early stage following the adoption of the Local Plan. This may result in traffic using the Aston Street junction subject to the impacts of the now programmed Town Centre (highway) Enhancement Scheme. It is proposed that the impacts of this scheme be monitored to assess the implications for the Aston Street junction with a view to considering further measures to manage the highway capacity of this junction.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0636	B021	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 RAF Cosford	No	No	No	Policy S21 designates RAF Cosford as a strategic site to be removed from the Green Belt to complement and enable the growth aspirations in the east of the County. The potential employment and training provision on this strategic site are expected to facilitate the sustainable growth of the local economy and contribute to meeting the employment needs of nearby Albrighton. The strategic site consists of around 221ha of land, over half of which is previously developed land but the land within the site and the aspirations for future development are not included in the identified need for 300 ha of employment land over the next plan period. The Council therefore need to demonstrate the exceptional circumstances for this land release in the Green Belt contrary to paragraph 135 of the NPPF. Policy S21 will not prevent coalescence between settlements nor will it assist in safeguarding the countryside from encroachment instead future development will have fewer restrictions leading to future sprawl of different types of employment uses and requiring further Green Belt release. This has resulted in a contradiction in the Plan between RAF Cosford being removed from the Green Belt to meet the development aspirations of the military and museum and releasing the land as a Strategic Site for other major developments without the constraints of the Green Belt. Significant development to date at RAF Cosford and Cosford Museum have already been permitted and developed under existing planning policies CS5, MD6 without requiring uncontrolled Green Belt land releases. The lack of clarity for the proposed strategic allocation is at odds with paragraph 16 (f) of the NPPF and paragraph 4 point N of Policy S21 that requires 'opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt will be included as part of any new development proposals in accordance with Green Belt Policy SP11'.
A0636	B022	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 Midlands Air Ambulance	No	No	No	Shifnal Town Council also note that the MAAC site is being promoted as part of the RAF Cosford Strategic Site and not as a one-off allocation for the MAAC. SC have no controls to ensure that the site is only developed for MAAC. Planning permission has now been granted as an exception for MAAC in the Green Belt, so this site no longer needs removing from the Green Belt or provided as a strategic allocation.
A0637	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Legal Compliance - General	No	No	No	Council should respond to the following issues before proceeding to approve and submit the Submission Local Plan to the Secretary of State. The issues to be addressed are: (1) the inadequacies with the evidence base used to inform this review process; (2) the methodology applied when calculating Shifnal's employment need, (3) justification on how other sites in Shifnal were ruled out in the sustainability appraisal and (4) the heritage assessment used to inform their site selection process and (5) why SC has chosen to take on the overspill of employment and housing development required by the Black County.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0636	B021	Need to understand how SC intend to mitigate the resulting impacts caused from the proposed Green Belt release on the wider landscape. Surely the openness of Green Belt will not be retained, so we are not sure why para 4n has been included.	<p>Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken. The comprehensive site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. The site assessment process also included consideration of landscape/visual amenity and strategic issues such as the relationship to the existing built form. Indeed, the extent of the proposed strategic site has been informed by consideration of the need to maintain an appropriate gap between RAF Cosford and Albrighton.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Furthermore proposed site guidelines recognise the need to make compensatory improvements to the Green Belt, consistent with national policy, including through appropriate additional planting to improve visual amenity and biodiversity and creation of linkages to green infrastructure networks and corridors beyond the site.</p>	No
A0636	B022	The proposed site for the MAAC no longer needs removing from the Green Belt or provided as a strategic allocation.	<p>Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site, including the aspirations of the Midland Air Ambulance Charity.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0637	B001	Council should respond to the following issues before proceeding to approve and submit the Submission Local Plan to the Secretary of State. The issues to be addressed are: (1) the inadequacies with the evidence base used to inform this review process; (2) the methodology applied when calculating Shifnal's employment need, (3) justification on how other sites in Shifnal were ruled out in the sustainability appraisal and (4) the heritage assessment used to inform their site selection process and (5) why SC has chosen to take on the overspill of employment and housing development required by the Black County.	<p>Shropshire Council considers that a proportionate and robust evidence base has been prepared to inform the draft Shropshire Local Plan. Shropshire Council also considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Comments on the Sustainability Appraisal (SA) noted. Proposed changes to SA would have no material effect so are not considered necessary.</p> <p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0637	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Legal Compliance - Gunning Principles	No	No	No	Common Law imposes specific requirements on public consultation through R.V Brent LBC Ex p. Gunning {1985} 4 WLUK 200 which set four legal principles for consultations to be legal (known as the Gunning Principles). These are that (i) Plans must be at a formative stage before a final decision has been made or pre-determined by the decision maker. the Council have not published consultation responses following the Regulation 18 Plan prior to publishing the Regulation 19 Plan and no written responses have been prepared to permit the public and elected local representatives to consider the arguments for the Regulation 19 Plan. This is considered to imply that the proposals in the Regulation 18 Plan were not at a formative stage and the Regulation 19 Plan has already been pre-determined including the employment land allocations in Shifnal. The Council have not responded to inconsistencies in the recording of the hectarage of land for SHF018b and SHF018d suggesting the figures used to release Green Belt land are not based on sound evidence contrary to the Gunning principles. Council also advertised RAF Cosford and SHF018b/SHF018d as potential development sites outside of the Green Belt prior to the strategic sites consultation where the sites were proposed for release from the Green Belt suggesting the Council had predetermined their strategic sites which is re-enforced by the lack of response to objections and queries following the consultation. (ii) There is sufficient information to give 'intelligent consideration' to the information provided. A number of evidence documents are missing, incomplete or out of date including the Local Transport Plan, Annual Monitoring Report, Tree & Woodland Strategy, Health and Well Being Strategy expires in 2021, no formal Estate Plans have been published to support Policy SP15, the Tourism Economic Impact Report is 2013, Landscape Characterisation Assessment is 2006. Information on the website, such as the proposed Local Plan period and the Local Development Scheme have not been kept up-to-date. There has been a lack of clarity over the hectarage of the employment allocations and the densities for the housing allocations in Shifnal, double counting in the calculation of the land area to be made available on the employment allocations which impacts on the release of Green Belt land. Inaccuracies in the Sustainability Appraisals. Therefore, how can the public be expected to judge the soundness of policies and proposals in the Plan, when crucial parts of the evidence are unavailable for the public to view. This is especially important when these proposals are likely to impact on the need to release Green Belt land. As well as going to the soundness of the plan and compliance with Government guidance, the failure to make accessible to the public evidence relied on by the Council, is contrary to the legal requirement in the Gunning case to permit intelligent consideration of accurate information bringing the soundness of the plan into question. (iii) There is adequate time for consideration and response to provide sufficient opportunity for consultees to participate in the process. There has been insufficient time through the review process with Regulation 18 Pre-Submission consultation permitting only 8 weeks during the summer holiday period. The Regulation 19 consultation was conducted in a similar manner over the Christmas period and national lockdown (addressed through an extension of the period) with libraries closed preventing access to the consultation documents that included matters affecting the whole County, 35 new policies referring to 50 evidence documents with appendices and a large number of new evidence documents contributing to the 11,000 page evidence base. In contrast, the Preferred Scale & Distribution of Development and Issues & Options Consultations that avoided holiday periods or the Preferred Sites and Strategic Sites consultation for just 4 sites that covered longer periods of 9 and 10 weeks. The period allowed was also reduced by the fact that several pieces of evidence quoted in the Plan were not put on the evidence base website at the start of the consultation period and nearly half was not put on the evidence base at all (this included the Infrastructure and Implementation Plan, Economic Development Needs Assessment, Transport Plan and Estate Plans) contrary to the statement on the Councils website on this consultation. This also contrasts with consultations on other public documents including a 12 week consultation on the revised Statement of Community Involvement that is 27 pages; 8 weeks for the Community and Rural Strategy that is 22 pages; and 12 weeks for the Cultural Strategy that is 33 pages. It is considered that this inconsistency is further evidence that this consultation is flawed and legally questionable. (iv) 'Conscientious consideration' must be given to the consultation responses before a decision is made. It is considered that the Council have not published evidence showing how consultation responses have been taken into account. The publication of a summary of responses does not demonstrate how feedback has been considered and how it has been incorporated into the next review phase or why the Council took decisions contrary to recommendations in the consultation responses.
A0637	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Duty to Co-operate	No	No	No	The duty to cooperate is a legal requirement for council's and statutory bodies to work together on strategic cross-boundary issues. In SC's case the county is adjoined by several local authority areas, and there are areas beyond this with a functional relationship, most notably the Black Country. As previously set out, there is no information contained in SC's evidence base which demonstrates why SC are proposing to include 1,500 dwellings to meet the Black Country needs. Without this key information being made publicly available, we cannot ascertain whether or not the duty to cooperate, under the Localism Act and NPPF has been conducted in an appropriate manner.
A0637	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Statement of Community Involvement	No	No	No	The Statement of Community Involvement (SCI) has not been regularly reviewed as required by Government guidance. The Council has also failed to comply with their SCI. The Town Council and local community have previously submitted detailed comments on locally relevant issues at each consultation stage, but SC have failed to respond to those concerns showing how they have taken those views into account or why they have not accepted them. This does not constitute effective or meaningful dialogue as the community involvement has been one way.
A0637	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Statement of Common Ground	No	No	No	Paragraph 27 of the NPPF sets out that 'authorities should produce, maintain, and update one or more statement(s) of common ground, throughout the plan-making process'. It goes onto state that 'such statements should be made publicly available throughout the plan-making process to provide transparency'. One of the tests of soundness is that a Plan must be effective and that cross-boundary matters that have been addressed are to be evidenced by the statement of common ground. This has not been demonstrated by SC and the current review process is unsound. As set out above SC are proposing to include 1,500 dwellings to meet the Black Country needs and no statement of common ground was submitted to accompany this consultation. Without this statement, there was no information on identified needs as required by paragraph 012 (reference ID: 61_024012-20190315) of the Plan Making guidance, for the public to understand the reasoning for this change. The NPPF requires that such statements should be provided throughout the preparation of the plan and not at the end. As members of the public have not been consulted on this, the evidence base is clearly flawed.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0637	B002	See summary of main issues.	<p>Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p>	No
A0637	B003	See summary of main issues.	<p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No
A0637	B004	N/A	<p>Shropshire Council strongly considers that it has met the requirements of the Statement of Community Involvement. The consultation process undertaken is also considered to comply with the Gunning Principles and national legislation.</p>	No
A0637	B005	N/A	<p>Shropshire Council has undertaken proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions have led to the proposed contribution of some 1,500 dwellings and 30ha of employment land to meet unmet cross-boundary need arising within the Black Country. This is considered an appropriate contribution towards these unmet housing needs. It is also considered appropriate to complete Statements of Common Ground with these Local Authorities informed by the content of the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0637	B006	Sustainability Appraisal	Sustainability Appraisal	No	No	No	Shropshire Council failed to satisfy Section 19 of the Planning and Compulsory Purchase Act 2004(PCPA), Regulation 5(1) and Regulation 12 and Schedule 3 of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) and the European Directive 2001/42/EC in Recital 17 to use the environmental report to inform the Plan and generally in “the assessment of the effects of certain plans and programmes on the environment”. The Council also failed in relation to the Strategic Environmental Assessment and Sustainability Appraisal guidance note Paragraphs 002 to undertake an iterative process and Para 018 to consider all reasonable alternative sites and the reasons for setting them aside. The preparation of the Pre-Submission Plan is therefore legally flawed and unsound. This failure is endorsed by Seaport Investments Ltd 2002 NIQB 62 that there must be parallel development of the environmental report and draft plan. In Berkeley v SoS Others 2002 3 WLR & Save Historic Newmarket Ltd v Forest Heath DC (2011 EWHC 606, and Royal Brompton & Harefield NHS Foundation Trust v Joint Committee of Primary Care Trusts (2011) EWHC 2986, there must be an environmental statement in a single accessible format prepared from the start of the process and presenting relevant environmental information with a non-technical summary to assist potential consultees. The Sustainability Appraisal fails to properly assess sites against all scoping objectives especially proximity to public transport (SO6 incorrectly recorded as quality of agricultural land), reduction of CO2 emissions (SO12) and adaptation and mitigation to climate change (SO13). The SA used to inform the site assessments failed to assess these key Scoping Objectives in the Pre-Submission Plan and Strategic Sites consultation rendering the process not legally compliant and producing site selection decisions that are inadequate, incorrect and unintelligible under the Gunning Principles. Site SHF018d was also not included in the SA and not assessed individually or against reasonable alternatives including SHF018a with a lower sustainability scoring. This indicates a pre-determination of the selected sites contrary to the Gunning Principles requiring consultation at a formative stage before final decisions are made. The SA on the Preferred Scale and Distribution (PSD) consultation stage was prepared on the basis Shifnal would receive 16ha of employment land and would minimise the need for additional car based transport. The Preferred Sites (PS) stage increased the amount of employment land for Shifnal to 40ha, but the SA failed to assess public transport criteria and to assess the SHF018d individually or against alternatives. The Council cannot show the increase in employment from 16 to 40ha and the allocation of Shif18d for employment use, would be sustainable development as these matters were not appraised at the appropriate time. The SLAA Report 2018 did not present a map with sites boundaries and these boundaries could only be ascertained through a web-site search without any cross referencing in the SLAA report. There was no map in the SA for the public to identify the location and boundaries of sites appraised. Case law states that a disparate collection of documents traceable only by a person with a good deal of energy and persistence does not satisfy legal requirements on making documents available to the public.
A0637	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 - Housing	No	No	No	Policy SP2 requires, from 2016 to 2038, the provision of around 30,800 new dwellings at around 1,400 dwellings per annum. SC need to clarify the uplift of this housing target to 30,800 above the minimum 25,894 new dwellings required by central Government and above the demographic need of only 20,746 new dwellings. SC also need to explain why 1,500 dwellings for Black Country needs is also accommodated in the proposed housing provision despite their being no change to the standard methodology for most West Midlands local planning authorities except for Birmingham, Wolverhampton, Coventry and Stoke-on-Trent. The existing 'standard methodology for calculating housing requirements is based on the lower 2014-household projections (not the 2018 based projections) for both Shropshire and Telford & Wrekin which would permit SC to reduce their housing targets rather than increase them to 30,800 dwellings.
A0637	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 - Employment	No	No	No	Policy SP2 requires, from 2016 to 2038, around 300 hectares of employment land at around 14ha of employment land per annum. Appendix 6 of the Employment Land Supply states that the strategic employment land supply will be 414ha and it is unclear how this figure contributes to the employment land requirement nor why the two figures are different. The 300ha requirement is considered sufficient to deliver enough jobs to achieve a sustainable balance with their housing requirement but SC need to explain how this balanced growth projection was calculated. The proposed 30,800 dwellings and 300 ha of employment land seem disproportionate and as an example, guideline employment land figure for Shifnal was previously 16 ha but increased to 41ha in the Pre-Submission Draft SLP. SC indicate the 1,500 new dwellings proposed at Shifnal should equal circa 1,500 new jobs. Each job needs on average 42.25 sq.m of finished floorspace equal to 40% of the entire employment site. This means, an additional 40% needs to be added to the overall total. The calculation is 1,500 new dwellings x 42.25 sq.m of floorspace x 40% equal to 15.84 ha. For the figure to increase to 41ha, the 40% provided by SC appears to be already included in the balanced growth calculation of 16 ha.SC need to explain the methodology to calculate Shifnal’s employment need. The employment land supply figure identified by SC also fail to account for employment land proposed at RAF Cosford (Aviation Academy, 1500 additional military personnel; new air ambulance development). This additional land puts the actual employment land figure at +50% above the 300ha requirement and so, there is a clear over provision of employment land over the next plan period.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0637	B006	See summary of main issues.	The Council considers that it has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 for its SA and site assessment process. No change proposed.	No
A0637	B007	The existing 'standard methodology for calculating housing requirements is based on the lower 2014-household projections (not the 2018 based projections) for both Shropshire and Telford & Wrekin which would permit SC to reduce their housing requirement from 30,800 dwellings.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.	No
A0637	B008	The actual employment land available in the County +50% higher than the 300ha requirement and so, the employment land requirement may be reduced over the next plan period. The employment land guideline for Shifnal should also be reduced to 16ha.	In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038. Shropshire Council also consider that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period. Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.	No

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A0637	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	No	No	No	Paragraph 7 of the NPPF sets out that 'the purpose of the planning system is to contribute to the achievement of sustainable development'. The draft plan has not been proactively prepared in accordance with the three overarching objectives, which help form sustainable development. Significant weight is placed on the economic objective for Shifnal and the wider district but very little on the social and environmental objectives. The proposed inclusion of 41 ha of employment land and 1,500 new dwellings in Shifnal will lead to substantial losses of Safeguarded Land and Green Belt eroding the natural green space between Shifnal and Tong. Contrary to paragraph 9 of the NPPF, the local circumstances, needs and opportunities for Shifnal are not considered and the proposed urban extension will have a detrimental effect on the surrounding landscape, road infrastructure, schools and health services. The proposed Draft Plan is therefore unsound. There is no recognition in the Pre-Submission Draft SLP of the potential impacts of Covid-19 on the local economy, including increased homeworking reducing the need for employment land. A more conservative estimate of the employment land requirements should be undertaken, with reconsideration of the requirement waiting until the next plan review, reassessing the economic situation when the full effects of Covid-19 can be assessed. Otherwise, there is a high likelihood that employment will not keep up with the high housing figure proposed and so balanced growth will not occur nor will sustainable development be achieved in accordance with Policy SP4.
A0637	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	No	No	No	Policy SP6 sets out that new development should ensure the health and well-being of individuals, communities and places. The location of Shifnal's employment land to the north east and future strategic housing to the south and west is contrary to the Neighbourhood Plan and the views of the local community on the future development of their town. A large proportion of Shifnal's existing and new housing stock south and west is split from the proposed employment land to the north east. The existing central railway line makes access from the south and west to the new employment land only achievable through the centre of Shifnal via the Market Place, Victoria Road, Braford Street and Aston Street junctions on a road network too constrained to carry the proposed increased transport movements throughout the town. This is assessed in 'Comments on the Effect on Traffic in Shifnal Caused by the Proposed Employment Land Development (Land off Stanton Road)'. In addition, the infrastructure improvements including highways improvements required by the recent inclusion of 1,100 new dwellings have yet to be implemented in Shifnal and Shifnal does not have the infrastructure or facilities to accommodate 41 ha of employment land and a further 1,500 new dwellings, in addition to the 1,100 new dwellings being built out. The employment and housing allocations are disproportionate to the existing settlement, fail to maintain or enhance the vitality of Shifnal and have a harmful impact on the social wellbeing of the local community, risking the erosion of community cohesion. SC must assess the proposed cumulative growth in Shifnal over this relatively short time from 2012 – 2021 and through the 2038 which will have a negative impact on social wellbeing and social cohesion within Shifnal contrary to Policy SP6.
A0637	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	No	No	No	SC concluded that exceptional circumstances exist for the release of Green Belt land without properly satisfying NPPF paragraph 137 to demonstrate that all other reasonable development options for meeting identified needs have been properly assessed. This omission affects land released for housing and employment uses on sites allocated for development to 2038 and also land safeguarded for future development. The evidence base for the Local Plan did not provide the reasons why other sites were rejected and did not consider other opportunities for industrial development within neighbouring Telford and the sub-region (Staffordshire, Wolverhampton, West Midlands etc) before changing the Green Belt boundaries around Shifnal. Shifnal Town Council suggested SHF018a as a more sustainable option than SHF018b/SHF018d to meet the employment needs of the town and no explanation was provided for rejecting SHF018a as safeguarded land. The land that is safeguarded is not justified in the evidence base, Sustainability Appraisal or Proposals Map. There is also conflict in Policy S15.1 between Point 4 which seeks to promote the local and sub-regional role and functions of Shifnal and Point 7 which protects the safeguarded land from development except in very special circumstances. These very special circumstances relate more to the sub-regional role of the town than to the local objectives in the Neighbourhood Plan which is a material consideration for the Local Plan. This also reflects an objective in the exceptional circumstances statement that Shifnal should perform the same role as Bridgnorth even though Shifnal is a smaller settlement, located close to the strategic centre of Telford. Shifnal is also expected to be influenced by development of the strategic site on the former Ironbridge Power Station. The release of Green Belt land for development and safeguarding cannot be justified as all reasonable options for development have not been assessed and exceptional circumstances for the release of this Green Belt land have not been properly identified.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0637	B009	A more conservative estimate of the employment land requirements should be undertaken, with reconsideration of the requirement waiting until the next plan review, reassessing the economic situation when the full effects of Covid-19 can be assessed.	<p>The draft Shropshire Local Plan seeks to achieve the sustainable development of Shropshire. All references to sustainable development within the draft Shropshire Local Plan recognise the three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). This is recognised within the introduction to the draft Shropshire Local Plan, which states "the pursuit of sustainable development is at the heart of the planning process" and that "achieving sustainable development will mean that decision takers must look at all facets of sustainability in arriving at decisions: economic, social and environmental. In all cases a balance of considerations is needed, and it is accepted this will often lead to a variety of opinions being expressed."</p> <p>The proposals within the draft Shropshire Local Plan have been informed by a comprehensive Sustainability Appraisal process.</p> <p>Draft Policy SP4 is not seeking to define sustainable development, rather it is providing clarity on how the presumption in favour of sustainable development introduced within the NPPF would apply, if relevant, in Shropshire.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Comments on the Sustainability Appraisal (SA) noted. Proposed changes to SA would have no material effect so are not considered necessary.</p> <p>With regard to the proposed safeguarded land, it is noted that the National Planning Policy Framework (NPPF) states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development".</p>	No
A0637	B010	Council must assess the proposed cumulative growth in Shifnal over this relatively short time from 2012 – 2021 and through the 2038 which will have a negative impact on social wellbeing and social cohesion within Shifnal contrary to Policy SP6.	The Council considers that there is no conflict between Policy SP6 and its strategy for Shifnal. The latter forms part of the overall approach to development in Shropshire which is aimed at achieving all facets of sustainable development, social, economic and environmental.	No
A0637	B011	See summary of main issues.	<p>It is understood that this representation primarily relates to the proposed strategy for Shifnal and not the content of draft Policy SP11. Issues raised relating to Shifnal are further addressed in the relevant settlement section.</p> <p>Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0637	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	No	No	No	Policy SP12 refers to the employment requirement to deliver around 300 ha of employment land throughout the plan period. The spatial strategy identified to achieve these objectives is also set out in Policy SP12. There is no explanation in this Policy nor in the description of the strategy to explain the reasons why proposed employment allocation SHF018d and SHF018b have been brought forward in Shifnal over other sites and SHF018a, in particular. This omission makes it difficult to establish whether the plan led approach is successful in protecting and improving areas of higher landscape value. In the evidence presented as part of SC's Highways Assessment, it is unclear why site 2- plots SHF018b & d are identified as having low or medium highways impact, whilst adjoining sites 1 and 3 are considered as having a high to very high highways impact. SC also need to clarify the methodology used for calculating Shifnal's balanced growth and resulting employment need.
A0637	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	No	No	No	Policy SP14 reiterates that development in the 'strategic corridors through the Green Belt or Shropshire Hills Area of Outstanding Natural Beauty will be subject to appropriate national and local policy. We consider that the proposed 41ha of employment land at Shifnal is at conflict with paragraph 137 of the NPPF, because exceptional circumstances to justify the Green Belt release in the area, has not been provided throughout the review process. The Pre-Submission Draft SLP refers to the role that Shifnal would play to provide strategic economic development in the M54 strategic corridor. The employment land proposed at RAF Cosford has not been included in the overall calculations to assess the need and it should be acknowledged that there is a plentiful supply of already committed employment land in neighbouring authorities in this corridor. It is an unsustainable assumption that Shifnal would attract such strategic employment development to justify the release of such large areas of Green Belt.
A0637	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	No	No	No	There is no justification for Policy SP15 to support the non-statutory plans of larger estate owners. The implementation of Policy SP15 would support the long-term vision and objectives of Bradford Estates to promote a new settlement at Tong providing support in principle for a development not currently proposed in the Local Plan housing requirement or housing supply projection. This would prejudice the ability of the public to comment on the specific development proposal and to influence the degree of future flexibility in permitting further development. This is despite the intention to have "meaningful public consultation" which could be open to wide interpretation depending on the point of view of the promoters or planning authority etc. Accordingly, there is a concern that Policy SP15 allows Bradford Estates to promote this scheme without any justification for the special privileges given to larger landowners in the County. SP15 prejudices the community against larger landowners which can be argued as being contrary to the Equality Act.
A0637	B015	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17	No	No	No	The strategic housing and employment allocations in Shifnal do not conform with Policy DP17 because they are not properly assessed against other sites in the Sustainability Appraisal nor are reasons given for rejecting alternative sites contrary to Section 13 of the NPPF (Protecting Green Belt Land). The Sustainability Appraisal (pages 91 – 96) finds Sites SHF018b and P15b score poorly for overall sustainability and much of the proposed 'safeguarded land also gets lowish scores but are included in the proposed sites. The extension east of Upton Lane (SHF018d) is contrary to national policy, as no exceptional circumstances are provided for its release. SC do not correctly apply the findings of the Green Belt Review Assessment to SHF018d which constitutes an unacceptable encroachment into the countryside, with no recognisable, permanent boundary, causing High Harm to the Green Belt and extending east of Upton Lane which is a clearly defined Green Belt boundary. This indicates no exceptional circumstances for this land release given the availability of alternative sites causing Less Harm particularly SHF018a now proposed as safeguarded land. SC state the Green Belt land releases for employment use (SHF018b and SHF018d) are of Moderate to High Harm but land east of Upton Lane has a High Harm to the Green Belt and landscape. SHF018d is part of Broad Area 29 In the Green Belt Review containing the proposed MAAC site intended to be removed from the Green Belt further causing moderate to high harm with no justification for these Green Belt land releases.
A0637	B016	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP21	No	No	No	Policy DP21 sets out that, "the safeguarding of people and property and mitigation of the effects of climate change, will be achieved by directing development to areas at least risk of flooding". SC's Strategic Flood Risk Assessment sets out that the majority of Shifnal is located within Flood Zone 1, with the area immediately around the Wesley Brook located within Flood Zones 2 and 3 (1 being low risk and 3 being high). This report has also identified that Shifnal has one of the highest surface water flood risks in the county and would be the most vulnerable to cumulative increases in flood risk due to new development. With most of this risk coming from Wesley Brook being a source to its confluence with River Worfe. In accordance with paragraph 157 of the NPPF it should be noted that the Sequential and Exception Test of Shifnal's proposed allocated sites in the Pre-Submission Draft Local Plan does not fully recognise Shifnal's identified surface water flood issues.
A0637	B017	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23	No	No	No	To date no strategic plan has been presented to illustrate how the Development Strategy for Shifnal will ensure the historic character of the town will be preserved or enhanced after the towns proposed extension in accordance with the objectives of Policy SP23. Evidence for the strategic allocations advised that heritage assessments were produced to inform the site selection process but it remains unclear as to how the historic environment was considered in the evidence base or from the Sustainability Appraisal contrary to Paragraph 185 of the NPPF which would question the soundness of the Plan. The Landscape and Visual Sensitivity Assessment also confirms the majority of parcels have visual and landscape sensitivity issues for existing landscapes, listed buildings and conservation areas. The allocations will change the appearance of the historic character of Shifnal, there will be intensification of traffic flows through the centre of Shifnal which is a factor that Historic England regards as affecting historic towns with development of transport infrastructure also affecting historic landscapes and damaging heritage assets.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0637	B012	Policy SP12 refers to the employment requirement to deliver around 300 ha of employment land throughout the plan period. The spatial strategy identified to achieve these objectives is also set out in Policy SP12. There is no explanation in this Policy nor in the description of the strategy to explain the reasons why proposed employment allocation SHF018d and SHF018b have been brought forward in Shifnal over other sites and SHF018a, in particular. This omission makes it difficult to establish whether the plan led approach is successful in protecting and improving areas of higher landscape value. In the evidence presented as part of SC's Highways Assessment, it is unclear why site 2-plots SHF018b & d are identified as having low or medium highways impact, whilst adjoining sites 1 and 3 are considered as having a high to very high highways impact. SC also need to clarify the methodology used for calculating Shifnal's balanced growth and resulting employment need.	Shropshire Council considers that the proposed strategy for supporting economic growth, development and business investment in Shropshire within the draft Shropshire Local Plan is appropriate, effective, sustainable and deliverable. It is also considered that the draft Policies of the draft Shropshire Local Plan are consistent, sufficiently flexible and positively contribute to the achievement of this strategy. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. It is considered that an employment land provision at Junction 3 of the M54 Motorway is not required during this Plan period to 2038. The employment policies SP12, SP13 and SP14 would still be sufficiently flexible to accommodate such an outcome in the event that the circumstances determining the strategy for the Local Plan were to change considerably during the Plan period.	No
A0637	B013	See summary of main issues.	Shropshire Council has undertaken a robust and proportionate site assessment process to inform the identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt including land at Shifnal proposed to be allocated for employment development and land proposed to be safeguarded for consideration in future plans for the growth and development of the town. The draft Local Plan should seek to achieve sustainable development for those areas where a planned strategy is presented in the Local Plan including Shifnal. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered to be appropriate for the draft Local Plan to address the need for new employment to be generated in Shifnal within the planned strategy for the town.	No
A0637	B014	There is a strong objection to policy SP15 and its potential interpretation which may prejudice the future protection of the Green Belt and public participation on future development proposals and the Council must address the omission of the Estate Plans in the Local Plan evidence base by making them available on the public.	Noted. The draft Shropshire Local Plan, including draft Policy SP15, has been subject to public consultation and sustainability appraisal. Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. Draft Policy SP15 recognises that Whole Estate Plans will be endorsed by the Council and used as a material consideration in decision making where the objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan; and it has been prepared in collaboration with relevant external organisations, including statutory bodies; and it has been subject to meaningful public consultation.	No
A0637	B015	See summary of main issues.	Policy DP17 requires development proposals to assess their impact on landscape and visual amenity and will apply to any planning applications on sites SHF018b, P15b and SHF018d. The principles behind policy DP17 have been applied through the Sustainability Appraisal and Site Assessment process which considered the landscape and visual sensitivity of all SHLAA sites based on the Council's Landscape and Visual Sensitivity Study.	No
A0637	B016	See summary of main issues.	The application of the Sequential and Exception Tests to all proposed site allocations is based on the information contained in the Council's Strategic Flood Risk Assessments (Levels 1 and 2) and follows national planning policy and guidance. As such the Council considers it is accurate and appropriate.	No
A0637	B017	The heritage assessments informing these decisions should be published to show the mitigation for the future conservation and preservation of heritage assets in Shifnal town centre.	Policy DP23 will ensure that heritage assets in Shifnal are safeguarded in response to development proposals. The Sustainability Appraisal and Site Assessment process considered heritage assets throughout and the results are available on the Council's website. No change proposed.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0637	B018	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP25	No	No	No	Shifnal has limited investment in infrastructure (including roads and footpaths, new medical centre, education and leisure facilities) to support the expansion of the town despite the recent 1,100 new dwellings recently approved and currently being built out, resulting in some 40% increase in the town's population. The Pre-Submission Draft SLP paragraph 5.215 highlights that the future housing extension to south and west of the town which is safeguarded) will provide improvements at Five Ways and Innage Road. However, S106 funding has already been obtained from developers of recent large housing developments for improvements to Fiveways to meet the increased traffic needs of the town. Further to this, no practical infrastructure improvements have been identified to accommodate the proposed growth of the town.
A0637	B019	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Shifnal Town Strategy	No	No	No	Council need to present evidence to justify the release of Green Belt land for safeguarding for future development beyond 2038 to the east, south and west of Shifnal. This designation implies the principle of development on this land is accepted despite the community not being consulted on this prior to including the land the Plan. The safeguarding of this significant area of land will also place further strain on Shifnal should the County be unable to demonstrate an adequate housing land supply in the short to medium term. Council need to justify the reason for considering Green Belt policies in the event that an earlier development proposal was considered for the safeguarded land under very special circumstances and whether the development of the land would be afforded the same weight as Green Belt land. Council need to demonstrate the very special circumstances for the release of allocations SHF018b and SHF018d and show that this omission will not provide a precedent for the release of further safeguarded land in a future review of the Local Plan. Council also need to have regard to the conservation of the historic character of Shifnal and make available any submitted heritage assessments to illustrate the proposed mitigation of to conserve and enhance the historic character of the town. The Local plan also needs to recognise the underlying consensus of the local community set out in the objectives of the Shifnal Neighbourhood Plan that any development should retain the small market town character as a principle attraction of the town. Council should justify the large release of Green Belt land which are contrary to national policy including paragraph 006 of the Planning Policy Guidance and which undermine the Shifnal Neighbourhood Plan. It is recognised that the Neighbourhood Plan only goes to 2026, the principle issues brought forward by the community and underpinning the Plan, are still relevant and should be reflected in the Local Plan proposals. The proposals are clearly a significant departure from the Neighbourhood Plan and the community and Shifnal Town Council has understandably raised the question about whether their efforts to produce the Plan were worthwhile. If the proposals were to go ahead this would naturally cause a great deal of local resentment. Council take into account both Market Drayton and Broseley Neighbourhood Plans, while Shifnal's Plan has not been acknowledged. We would like to understand why this is the case.
A0637	B020	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Shifnal: SHF018b/SHF018d - Traffic Impacts	No	No	No	The proposed employment development land located off Stanton Road will create a substantial increase in traffic on Stanton Road and Aston Street even if commercial vehicles could be effectively restricted from using this route. The main commercial centre in East Shropshire is Telford, which lies to the west of Shifnal, and Aston Street is the direct route to Telford from the proposed development. Vehicles wishing to access and egress from the west will use the Aston Street / Stanton Road route as it is more than 8 kilometres shorter than the A41 / M54 route to Junction 4 of the M54. The A41/Stanton Road junction is also a site of morning and evening stationary traffic for vehicles trying to travel in the direction of the M54 Stanton Road and Aston Street are not suitable for carrying the additional volume and increased unit weight of the generated traffic because: (1) The junction with Bradford Street and the A464 trunk road is already well beyond capacity and causes substantial delays and congestion at peak periods. Proximity of buildings within the Shifnal conservation area preclude any opportunity of additional land take for upgrading. (2) The turning movements at this junction currently disrupt traffic flows on both the A464 and the A4169. (3) The existing carriageway is narrow (6 metres) and cannot be widened due to the proximity of buildings. (4) The existing carriageway construction is not engineered and is not capable of taking additional and heavier traffic. It is currently in a poor state of repair. (5) The station approach and the main shopping car park access onto Aston Street, both junctions having severely impaired sight. (6) Aston Street residents are obliged to park on Aston Street causing single line traffic flows as there is no access to the rear of their properties. (7) Aston Street dwelling doorways access directly onto the pavement, and the increase in noise, dust and vibration will be detrimental to their environment. (8) The Bradford Street/ Aston Street junction is crossed by the principal walking route to the train station from the town centre including provision for those with impaired sight and wheelchair users. (9) The existing pedestrian footpaths at the junction are narrow and hazardous.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0637	B018	The Council need to acknowledge the infrastructure needs of the community and their concerns at the infrastructure capacity of the town and where and when further infrastructure investment will be provided in advance of further developments in Shifnal.	The infrastructure needs of Shifnal will be taken into account through the Strategic Infrastructure Implementation Plan and Place Plan process.	No
A0637	B019	Council should not remove the proposed safeguarded land from the Green Belt and should instead demonstrate the very special circumstances for the release of land for further development. The Council should also publish any submitted heritage assessments to illustrate the proposed mitigation to conserve and enhance the historic character of the town should any land be released from the Green Belt for development.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. Shropshire Council has set out in detail the exceptional circumstances for releasing land from the Green Belt for employment development to promote the growth and development of the town. This seeks to achieve sustainable development for Shifnal through the planned strategy in the Local Plan. To be considered as sustainable development the planned strategy should meet the broader social, economic and environmental needs of the community at the heart of the strategy. Whilst there are a range of employment opportunities in the areas around Shifnal and its Place Plan area, there are significant limits to the availability of employment in Shifnal itself and there are very few new employment development opportunities in the town. Consequently, it is considered appropriate for the draft Local Plan to address the need for new employment opportunities to be delivered in Shifnal in the period to 2038. Sites SHF018b and SHF018d are proposed by a developer with a proven record of delivery and the resources to bring forward the site in a location where other interest has been expressed in the delivering this employment allocation. Sites SHF018b and SHF018d are both proposed for development to reduce the risks involved in delivering the strategic highway and utilities infrastructure that is essential for the delivery of this important employment development opportunity in Shifnal. . Development guidelines for sites released for development will ensure the site design, layout and landscaping respects the character and significance of adjoining land uses. In the Green Belt, this is required to strengthen the boundary to the urban area to help maintain the openness and permanence of the Green Belt around Shifnal. On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038.	No
A0637	B020	See summary of main issues.	Shropshire Council considers the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations and proposed safeguarded land a comprehensive site assessment process has been undertaken. The draft Local Plan makes a nominal addition of three smaller sites for 230 dwellings to the existing committed supply of 370 dwellings which will complement the 1,000+ dwellings that are anticipated to have been built or are under construction in the town up to 2021. This site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. On the completion of the proposed 1,500 dwellings in Shifnal, which is expected to occur before 2026 it is proposed that housing development should cease and not be resumed again until after 2038. This period of respite from housing development will also allow infrastructure improvements to occur in the town including programmed improvements to key locations on the highway network in the town and for the community to assimilate the growth of the town since the adoption of the SAMDev plan in 2015. In relation to the anticipated respite from further housing development in Shifnal, it is proposed that much of the land released from the Green Belt will be safeguarded for future development and it is intended that this land will remain open and undeveloped during the remaining Plan period to 2038. It is recognised that whilst housing development may cease on the completion of the proposed 1,500 dwellings, it is proposed that employment development will commence at an early stage following the adoption of the Local Plan. This may result in traffic using the Aston Street junction subject to the impacts of the now programmed Town Centre (highway) Enhancement Scheme. It is proposed that the impacts of this scheme be monitored to assess the implications for the Aston Street junction with a view to considering further measures to manage the highway capacity of this junction.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0637	B021	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 RAF Cosford	No	No	No	Policy S21 designates RAF Cosford as a strategic site to be removed from the Green Belt to complement and enable the growth aspirations in the east of the County. The potential employment and training provision on this strategic site are expected to facilitate the sustainable growth of the local economy and contribute to meeting the employment needs of nearby Albrighton. The strategic site consists of around 221ha of land, over half of which is previously developed land but the land within the site and the aspirations for future development are not included in the identified need for 300 ha of employment land over the next plan period. The Council therefore need to demonstrate the exceptional circumstances for this land release in the Green Belt contrary to paragraph 135 of the NPPF. Policy S21 will not prevent coalescence between settlements nor will it assist in safeguarding the countryside from encroachment instead future development will have fewer restrictions leading to future sprawl of different types of employment uses and requiring further Green Belt release. This has resulted in a contradiction in the Plan between RAF Cosford being removed from the Green Belt to meet the development aspirations of the military and museum and releasing the land as a Strategic Site for other major developments without the constraints of the Green Belt. Significant development to date at RAF Cosford and Cosford Museum have already been permitted and developed under existing planning policies CS5, MD6 without requiring uncontrolled Green Belt land releases. The lack of clarity for the proposed strategic allocation is at odds with paragraph 16 (f) of the NPPF and paragraph 4 point N of Policy S21 that requires 'opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt will be included as part of any new development proposals in accordance with Green Belt Policy SP11'.
A0637	B022	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S21 Midlands Air Ambulance	No	No	No	Shifnal Town Council also note that the MAAC site is being promoted as part of the RAF Cosford Strategic Site and not as a one-off allocation for the MAAC. SC have no controls to ensure that the site is only developed for MAAC. Planning permission has now been granted as an exception for MAAC in the Green Belt, so this site no longer needs removing from the Green Belt or provided as a strategic allocation.
A0638	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	Not Specified	No	Not Specified	Petition coordinated by Shifnal Matters and signed by multiple parties. Object to the draft Shropshire Local Plan for Shifnal and its surround area as: -Insufficient consideration undertaken for planned removal of land from the Green Belt. Evidence cited is factually incorrect and insubstantial. -The level of new strategic residential allocations proposed would change the character of Shifnal as a place to live to the detriment of existing residents and the setting of the town. -Infrastructure (including roads, schools and medical facilities) insufficient to support proposals and no assessment of these has been undertaken. -Proposed 41ha employment allocation (providing about 1,750,000sq ft of space) is excessive, especially as there are better sites for employment use within a 10 mile radius of Shifnal. -Shropshire have not been proactive, positive or collaborative in their approach to preparing the draft Shropshire Local Plan.
A0639	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2	Yes	Yes	Yes	I fully support Hadnall Parish Council's endorsement of HDL006 as the preferred site and the adoption of the Hadnall as a community hub. I would also like to see HDL013 and HDL016 included within the development boundary
A0640	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Unspecified	No	No	No	Support views of Trefonen Rural Protection Group

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0637	B021	Need to understand how SC intend to mitigate the resulting impacts caused from the proposed Green Belt release on the wider landscape. Surely the openness of Green Belt will not be retained, so we are not sure why para 4n has been included.	<p>Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken. The comprehensive site assessment process included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page. The site assessment process also included consideration of landscape/visual amenity and strategic issues such as the relationship to the existing built form. Indeed, the extent of the proposed strategic site has been informed by consideration of the need to maintain an appropriate gap between RAF Cosford and Albrighton.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Furthermore proposed site guidelines recognise the need to make compensatory improvements to the Green Belt, consistent with national policy, including through appropriate additional planting to improve visual amenity and biodiversity and creation of linkages to green infrastructure networks and corridors beyond the site.</p>	No
A0637	B022	The proposed site for the MAAC no longer needs removing from the Green Belt or provided as a strategic allocation.	<p>Shropshire Council considers the proposals for the RAF Cosford Strategic Site are appropriate, effective, sustainable and deliverable. It is considered the land identified will support and facilitate the extensive range of development aspirations that have been identified for the RAF Cosford site, including the aspirations of the Midland Air Ambulance Charity.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0638	B001	Reconsider evidence for Green Belt release. Reduce the level of housing proposed in Shifnal. Reduce the amount of employment land proposed in Shifnal and reconsider proposed site allocations.	<p>Shropshire Council considers that the proposed development strategy for Shifnal and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that proposed safeguarded land is not allocated for development but safeguarded for beyond the proposed Plan period.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape and Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>Comments on the Sustainability Appraisal (SA) noted. Proposed changes to SA would have no material effect so are not considered necessary.</p>	No
A0639	B001	n/a	n/a	No
A0640	B001	Trefonen should not be a hub - its should be open countryside	Shropshire Council undertook a robust assessment during the Hierarchy of Settlement process and Trefonen's services and facilities meant that its score resulted in it being a Hub. Notably there are no housing allocations in the settlement as part of this Plan Review. A minor modification is proposed to reduce the gross housing requirement for the village over the plan period (see response to A0605)	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0641	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S13.1 Much Wenlock MUW012VAR	No	No	Not Specified	<p>The proposed site allocation ignores the status and policies of the Much Wenlock Neighbourhood Plan, which explicitly rejects large site development in favour of organic small-site development to meet local needs. This has worked successfully throughout the past six years with a steady number of dwellings being completed in each year. Although the Shropshire Local Plan extends beyond the Neighbourhood Plan's period of operation, no justification is given for not continuing with its policies or principles in future years. The site allocation proposed is one which is commercially driven and is not in accordance with community wishes.</p> <p>In Shropshire Council's Statement of Community Involvement, it commits to undertake meaningful public engagement. However no recent effective surveys or widespread consultation of the community have been undertaken either by Shropshire Council or the Much Wenlock Town Council about local wishes and needs. The consultation which did take place around the Place Plan included only details on proposed development of the site allocation which have since been modified and extended through negotiation with the landowner, seemingly to meet the landowner's commercial needs. There was little support shown for the proposed site allocation in the Place Plan consultation and the subsequent changes increase the proposed number of dwellings, thus extending the divergence from the policies in the Much Wenlock Neighbourhood Plan.</p> <p>The Neighbourhood Plan, which was the outcome of extensive public consultation and survey work and overwhelmingly approved in a local referendum, expressed the clear preference of the community for small scale development. There has been no public consultation or survey work which would indicate a change in the views of local residents and businesses in the intervening time.</p>
A0642	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3 (BRD030)	Not Specified	No	Not Specified	<p>Very little community engagement, as set out in the Council's Statement of Community Involvement (SCI), has taken place. It should be noted that the surprising late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ (particularly due to Covid 19 restrictions). Given significance of this proposal and the alternatives available, would have expected a public debate on the merits of both proposals at the same time.</p> <p>It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored.</p> <p>A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.</p>
A0642	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Bridgnorth is identified as the second largest Principal Centre, would challenge this as there are other towns at least the same size as Bridgnorth which should share the burden of the proposed housing increase.</p> <p>The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030).</p> <p>At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers '.. will make provision for the needs of the town and surrounding hinterland...'?</p> <p>In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?</p>
A0642	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area - BRD030	Not Specified	No	Not Specified	<p>The Town and Country Planning Association (TCPA) has produced a number of principles for the development of Garden Villages. The three main principles are reference in the development statement prepared by the promoters of BRD030 but there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.</p> <p>Challenge claim BRD030 is a garden village (it is not planned by the local planning authority or in consultation with the local community but rather by a developer) and does not comply with TCPA or MHCLG definition of a garden village. This term is being used to disguise the proposal for a very large housing estate. It is totally inappropriate, not needed, not supported locally and will damage the character of the town and surroundings.</p> <p>The size and location of BRD030 is more akin to a large suburban development on the outskirts of a market town rather than the "sustainable urban extension" stated in the Local Plan.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0641	B001	Removing site allocation MUW012VAR from the Local Plan and its replacement with proposals consistent with the Much Wenlock Neighbourhood Plan.	The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Much Wenlock, as the Neighbourhood Plan covers the period to 2026 (in accordance with the adopted Local Plan) there is a need for Shropshire Council to plan effectively for a further 12 years to the end of the new proposed Plan period to 2038. As such the draft Shropshire Local Plan provides an appropriate development strategy for the settlement. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.	No
A0642	B001	Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored. Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.	Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.	No
A0642	B002	Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years). Provide evidence that Bridgnorth can sustain a 35% population increase, particularly with regard to highway capacity.	Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development. There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.	No
A0642	B003	The development statement prepared by the promoters of BRD030 reference the three main principles for development of garden villages identified by the TCPA, however there is no indication of how they will be achieved. Shropshire Council should require and monitor compliance with them.	Noted. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This included consideration of highway and accessibility informed by comments from highway officers. Proposed site guidelines for BRD030 provide a framework for any future development of the site. They include that "A comprehensive mixed-use sustainable urban extension. Development will comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines, whilst also complementing Bridgnorth's character."	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0642	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable? Seems the promoter of BRD030 is using this as a means to hop the bypass and achieve housing that is totally disproportionate, undesirable and detrimental.
A0642	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not compatible with one another re poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue. No consideration appears to have been given to ground contamination caused by animal waste and run-off from market activities.
A0642	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Roads area also difficult during busy times in the agricultural calendar (due to agricultural nature of the area), this can cause congestion, frustration (and associated accidents), increasing vehicles will exacerbate these issues. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458, it will also remain a long walk (particularly for parents with children). Clarification required on feasibility of this or alternative means of achieving safe crossing points.
A0642	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 specifies development can only occur where there is sufficient infrastructure capacity available or where the development funds necessary improvements to infrastructure through a suitable developer contribution. What contributions are required of BRD030 and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 recognises businesses and communities require quality broadband provision/mobile network connectivity and also states development proposals will be expected to provide infrastructure for broadband and mobile communications as essential utilities. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0642	B004	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p> <p>What consideration has been given to work patterns/demographics following Covid 19, which will impact on demand for housing/commercial premises/other aspects of life?</p>	<p>Noted. Shropshire Council has undertaken an Economic Development Needs Assessment and Employment Land Review to inform the Local Plan Review. The Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Specifically with regard to employment land, this proposed strategy provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Having a supply of land which creates choice and competition in the market provides flexibility to respond to changing circumstances.</p> <p>Employment allocations are specifically allocated for employment purposes. Draft Policy SP13 indicates that allocated employment land will be protected for employment generating uses and alternative uses will only be supported in specific circumstances, as documented within the draft Policy.</p>	No
A0642	B005	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p> <p>Ground contamination should be assessed.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0642	B006	<p>What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur.</p> <p>Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No
A0642	B007	<p>Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030.</p> <p>Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision.</p> <p>Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0642	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP17, DP18 and S3 (BRD030)	Not Specified	No	Not Specified	Draft Policy DP17 requires landscape and visual sensitivity assessments for sensitive sites. Has such an assessment been undertaken for BRD030 and is so why has it not been published? Draft Policy DP18 addresses issues such as agricultural land, noise and odour. BRD030 is classified as grade 3 agricultural land, why is it proposed for development (food production in the UK is already under threat). BRD030 is close to and may generate noise, has a noise assessment been undertaken (if so why has it not been published), and this issue mitigated. BRD030 is also close to sources of odour, how will this be mitigated. There is an Air Quality Management Area (AQMA's) in Bridgnorth, which the draft Shropshire Local Plan states will be considered when assessing development proposals. Given the capacity of BRD030 and associated vehicle movements, what measures will be taken to improve the air quality in and around Bridgnorth? BRD030 is also within the impact risk zone for four SSSI's and contains environmental networks. Why is the site proposed for allocation, knowing the ecological damage development would cause and what safeguards for these are proposed.
A0643	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.2 Hinstock	Yes	No	No	Out of a total of 18 site assessments, 6 sites were automatically removed from the site assessment process, including my own site, being HKW006. The summary of my site is inaccurate and I did not put it up for assessment because I was not approached to participate in the process. I feel that it is unreasonable to give a site assessment if the necessary information has not been sought or confirmed by relevant parties. For example, this site is recorded as being used as allotments, despite it not being used for allotments since 2014. The size of the land has been recorded inaccurately. It is stated as being 0.34 acres but is actually 0.42 acres. Since 1976 to present day the land has stood mainly unused apart from its use as allotments from 2009 until 2014. The details of the land provided via the Strategic Land Availability Assessment (29 November 2018) indicates that there is only one piece of land (as shown in appendix A), some of which is still currently allotments. The land is actually in two parts and has been since around 1975, as indicated in Appendix B, which shows two boundary lines. These have been incorporated into one piece of land in the site assessment. I will be updating the status of the land with the council to make them aware of these issues and to avoid any future problems.
A0644	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.2 St Martins	Not Specified	No	Yes	I object to the smaller field directly behind the rear gardens of 1-14 Moors Bank being included in the plans. This is due to residents using this field for recreational walking to access the right of way paths, to walk to the canal, for many years. Access is also needed to our rear gardens, for purposes such as large machinery, due to narrow access at the front. If this field is developed for residential housing, it will have a detrimental impact on our quality of life, as we as a family spend large amounts of time in our garden. Our garden is a safe place for our children to play and enjoy the outdoors, especially during the Covid-19 Pandemic, where our gardens and fields are the only means to exercise and ensure wellbeing of mental health. This would no longer be the case, if this field is included as a site for residential development, as we'd be living next to a building site, and then being overlooked by housing, with no access to the right of way paths to the canal, and no access to our rear garden.
A0644	B002	Sustainability Appraisal	S14.2 St Martins	Not Specified	No	Yes	Page 38 Site SMH031 has a very low score of -8 in the SA with only 3 other sites scoring lower, out of 41 sites. It is our opinion, this site should not have been included as a development site for residential homes.
A0645	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy DP18 states development should avoid best and most versatile agricultural land (BMV land), wherever possible. The National Planning Policy Framework (NPPF) also seeks to protect and enhance soils and recognise the economic and other benefits of BMV land. STC002 and P58a have not been subject to detailed agricultural land classification (ALC) surveys, so there is no definitive information on presence of BMV land, as required for decision making. The only ALC survey is the Natural England Regional Map, which indicates the sites are grades 2/3, but this is small scale and not suitable for identifying grading at site level and does not distinguish between grades 3a and 3b - vital for identifying BMV land. Natural England has also produced regional maps showing probability of BMV land, which shows STC002 and P58a have a moderate (20-60%) to high (>60% of the area) likelihood of BMV land. A post 1988 ALC survey on similar land near Barnsley shows an ALC ranging from 2 and 3a to 3b. As such, there is a high probability of BMV land, which should be given due consideration in planning decisions. Recent Covid 19 crisis highlighted need for food security and the climate crisis requires action to reduce carbon emissions - growing more food locally is necessary to address this. However, food self-sufficiency is declining in the UK (64% in 2019 compared to 78% in 1984) and currently only 58% of vegetables and 16% of fruit consumed in the UK are grown here. As such, inappropriate and not sustainable for BMV land to be permanently lost from production.
A0645	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 (BRD030)	Not Specified	No	Not Specified	Draft Policy DP18 states development should avoid best and most versatile agricultural land (BMV land), wherever possible. The National Planning Policy Framework (NPPF) also seeks to protect and enhance soils and recognise the economic and other benefits of BMV land. BRD030 has not been subject to detailed agricultural land classification (ALC) surveys, so there is no definitive information on presence of BMV land, as required for decision making. The only ALC survey is the Natural England Regional Map, which indicates the site is grade 3, but this is small-scale and does not distinguish between grades 3a and 3b - vital for identifying BMV land. Natural England has also produced regional maps showing probability of BMV land, which shows BRD030 has a high (>60% of the area) likelihood of BMV land. A post 1988 ALC survey on similar land to the west of BRD030 shows Grade 3a. As such, there is a high probability of BMV land, which should be given due consideration in planning decisions and retained for agricultural use wherever possible. Recent Covid 19 crisis highlighted need for food security and the climate crisis requires action to reduce carbon emissions - growing more food locally is necessary to address this. However, food self-sufficiency is declining in the UK (64% in 2019 compared to 78% in 1984) and currently only 58% of vegetables and 16% of fruit consumed in the UK are grown here. As such, inappropriate and not sustainable for BMV land to be permanently lost from production.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0642	B008	<p>Prepare/publish a landscape and visual sensitivity assessment and noise assessment for BRD030, undertaken by a suitable professional.</p> <p>Explain why BRD030 should be allocated on grade 3 agricultural land at a time when food production in the UK is under threat (what assessment of implications of Brexit on imported foods and possible demand for food produced in the UK have been undertaken?).</p> <p>Explain the measures to be taken to improve air quality in Bridgnorth.</p> <p>Explain how noise and odour will be mitigated.</p> <p>Justify inclusion of BRD030 given known ecological damage it will cause and explain what measures will be put in place to safeguard SSSIs and environmental networks?</p>	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, including those in DP17 and DP18, unless material considerations indicate otherwise. This is consistent with any development proposal.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process. This considered issues such as landscape and visual sensitivity, agricultural land quality, noise/odour and air quality, and ecology.</p> <p>Proposed site guidelines for BRD030 provide a framework for any future development of BRD030, guidelines proposed address such issues as noise and odour, the requirement for and need to positively respond to local and strategic highway transport assessments and an air quality assessment and the need to safeguard and appropriately buffer natural environment assets on and around the site.</p>	No
A0643	B001	<p>I believe that it is necessary and fair that I am involved in the assessment of the land and provide the necessary information so that a valid decision can be made on the piece of land. This process if not giving people a reasonable chance to be included in the plan or for proper decisions to be made.</p> <p>If proper checks had been made it would have been seen that this piece of land is in fact two separate pieces. Ideally land that has not been put forward for assessment should have been checked via the Land Registry to ensure accurate information is gained.</p>	<p>The Call for Sites was undertaken in 2017 and land owners had the opportunity for years after this to promote their land as part of the Local Plan Review. It is therefore considered that landowners or those representing them had significant time to promote their land for development, and Shropshire Council undertook a long and robust site assessment process which ultimately led to the preferred allocations.</p>	No
A0644	B001	<p>The smaller field directly behind 1-14 Moors Bank, should be excluded from this development site, leaving just the main larger field for development.</p>	<p>A PROW runs near the site, with its nearest point around 130m from the preferred allocation's SE corner. However, the main access points for this PROW are from either Moors Lane to the south or off an unnamed road off Church Street to the north. Notably there are no PROWs running through the preferred allocation. All sites promoted since the Call for Sites went through a robust site assessment process and this site is deemed appropriate for residential development. Any planning application for housing would have to ensure that it is appropriate in terms of encroachment on existing dwellings etc. however this is dealt with at the planning application stages.</p>	No
A0644	B002	<p>It is our opinion, this site SMH031 should not have been included as a development site for residential homes due to the low scoring on the sustainability appraisal.</p>	<p>SA is an important consideration in the site assessment process, but this is balanced against a number of other issues meaning that a site's SA rating is not the sole determinant. No change proposed.</p>	No
A0645	B001	<p>Undertake a detailed Agricultural Land Classification survey (with auger borings at an intensity of a least 1/ha allowing areas of 'Best and Most Versatile' land to be identified with confidence) for sites STC002 and P58a. Results of this survey should be taken into account in development proposals to "avoid Shropshire's Best and Most Versatile Agricultural Land (grades 1, 2 and 3a) wherever possible" as stated in draft Policy DP18. Where grade 3b or poorer quality land is present, these areas should be developed in preference to BMV land.</p>	<p>Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It identifying proposed allocations, a proportionate and robust site assessment process has been undertaken, including consideration of agricultural land quality (where a precautionary approach has taken place).</p>	No
A0645	B002	<p>Undertaken a detailed Agricultural Land Classification survey (with auger borings at an intensity of a least 1/ha allowing areas of 'Best and Most Versatile' land to be identified with confidence) for site BRD030. Results of this survey should be taken into account in development proposals to "avoid Shropshire's Best and Most Versatile Agricultural Land (grades 1, 2 and 3a) wherever possible" as stated in draft Policy DP18.</p>	<p>Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It identifying proposed allocations, a proportionate and robust site assessment process has been undertaken, including consideration of agricultural land quality (where a precautionary approach has taken place).</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0646	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP10	Yes	No	Yes	The Estate supports the objectives of Policy DP10 to deliver high quality, sustainable tourism and leisure offers including those which are sensitive to but also respond to the opportunities presented by the natural and built, including the historic environment of the district. The acknowledgment of the value of these sectors to the local economy is also welcomed. The Estate already contributes to the leisure opportunities in the district, being an important enabler of access to the countryside through the public access available to a network of rights of way and areas of woodland at Haughmond Hill, which provides a major amenity for Shrewsbury. There is potential to further enhance this, which will be explored as part of the Whole Estate Plan process. The Estate is therefore pleased to see support for new tourism, culture and leisure developments in the district, including appropriate development in rural areas. The Estate also supports the acknowledgment of the appeal to people of rural locations for holiday stays and supports the opportunities for the delivery of new visitor accommodation in rural areas. However the Estate considers the Council's policy for managing tourism, culture and leisure developments is partially unsound when considered against the tests set out within Paragraph 35 of the NPPF. The change is considered necessary to ensure that Policy DP10 is consistent with Paragraph 83 of the NPPF, which supports sustainable rural and leisure development which respect the character of the countryside with no proviso that this relates to an already existing enterprise.
A0646	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23	Yes	Yes	Yes	The Estate considers the Councils approach to conserving and enhancing the historic environment as set out within DP23 is sound when considered against the tests set out in para 35 of the NPPF.
A0646	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16	Yes	Yes	Yes	The Estate considers the Councils approach to development in Shrewsbury as set out within S16 is sound when considered against the tests set out in para 35 of the NPPF.
A0646	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 SHR166	Yes	Yes	Yes	The Estate considers the proposed allocation SHE166 is sound when considered against the tests set out in para 35 of the NPPF. In response to Historic England's previous comments, a Heritage Assessment has been undertaken to support the proposed allocation.
A0646	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Yes	Yes	Yes	Consider the approach to development in Shrewsbury as set out within SP2 is sound when considered against the tests set out in para 35 of the NPPF.
A0646	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Yes	Yes	Yes	Considers the Councils approach to development in Shrewsbury as set out within SP7 is sound when considered against the tests set out in para 35 of the NPPF.
A0646	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	Yes	Yes	Yes	The Estate considers the Councils approach to development in Shrewsbury as set out within SP10 is sound when considered against the tests set out in para 35 of the NPPF.
A0646	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Yes	Yes	Yes	The Estate considers the Councils approach to development in Shrewsbury as set out within SP12 is sound when considered against the tests set out in para 35 of the NPPF.
A0646	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13	Yes	Yes	Yes	The Estate considers the Councils approach to development in Shrewsbury as set out within SP13 is sound when considered against the tests set out in para 35 of the NPPF.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0646	B001	Amend as follows (adding "and/or"): 1g) Development of high-quality visitor accommodation in accessible locations served by a range of services and facilities, which enhances the reputation of Shropshire as a tourist destination to stay. In rural areas, proposals must be of an appropriate scale and character for their surroundings, be close to or within settlements, or close to an established and/or viable tourism enterprise where accommodation is required, whilst meeting the requirements of DP24 where appropriate. Where possible, existing buildings should be re-used (development must also accord with Policy SP11).  Remove point 9 as it is too restrictive and may not allow for innovative accommodation offers to come forward.	Noted. Shropshire Council considers that the existing wording under 1g) is appropriate as the tourism enterprise should be established AND viable rather than just one of those two. To add "and/or" here may result in unviable tourism which will ultimately lead to a backdoor entrance for inappropriate residential dwellings in the countryside.  Para 9 will remain as it protects the countryside from inevitable holiday let units which ultimately seek to become residential dwellings	No
A0646	B002	n/a	Noted.	No
A0646	B003	n/a	Support noted.	No
A0646	B004	It is suggested that the 'Development Guidelines' as currently set out against Site SHR166 could be expanded to include additional detail on how the site could be brought forward which mitigates against any potential harm, particularly to the setting of the heritage assets. This would require a Masterplan to be brought forward for the site, which would respond to a series of Development Guidelines	Noted. Appropriate minor modifications are proposed to the draft site guidelines for SHR166.	No
A0646	B005	n/a	Noted.	No
A0646	B006	n/a	Noted.	No
A0646	B007	n/a	The draft Shropshire Local Plan has to address a wide range of issues and requirements and is intended to be read as a whole . Therefore, in addition to the criteria set out in Draft Strategic Policy SP10, the relevant considerations of all other applicable policies will need to be taken into account in decision making on planning applications, along with other material considerations which can include other plans such as the AONB Management Plan which is directly referenced in draft Policy DP24.	No
A0646	B008	A cross reference to Whole Estate Plans (Policy SP15) , and their role in facilitating such development, should be made within Policy SP12, to ensure clarity in future decision making.	The Local Plan should be read as a whole, and any planning application made would need to adhere to all of the relevant policies	No
A0646	B009	It is suggested that the policy also needs to acknowledge the flexibility encouraged by Paragraph 120 of the Framework, and provide for a mechanism whereby historical located sites which have not come forward for their allocated use, should be considered positively for alternative uses. An example would the Estate's employment allocation at Battlefield (Site Ref SHR203), which could potentially be utilised more efficiently as a mixed use site reflecting the residential allocation on the adjacent half of the site, as well as surrounding commercial uses.	Shropshire Council considers that Policy SP13 and the employment development strategy for Shropshire is appropriate, effective, sustainable and deliverable. Draft Policies SP12, SP13 and SP14 clearly set out and structure the employment development strategy for Shropshire and articulate the strategic approach for the Local Plan in relation to the management and delivery of economic development and employment in Shropshire. The purpose of these policies is to also satisfy the requirements in NPPF particularly in paragraph 16(d) to make it evident how a decision maker should react to development proposals in a number of different locations and circumstances. The policies also recognise the need for flexibility arising from the presumption in paragraph 10 in favour of sustainable development and the need for decision makers to determine significant proposals taking into account other considerations alongside the policies of the Plan or equally, where circumstances may change and necessitate a more positive response to employment development proposals such as through the Brexit decision and the Covid-19 pandemic. In relation to site SHR203, it is considered that sufficient flexibility has been accorded to the development of this land. SHR203 and the adjacent residential allocation (referenced by the respondent) previously formed a mixed use allocation and SHR203 was defined as a suitably sized, viable employment site that also formed a buffer of conforming employment uses around the site of an adjacent key employer in Shrewsbury. It is considered that a further sub-division of SHR203 would raise issues of conformity with draft Policy SP13.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0646	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Yes	Yes	Yes	The Estate considers the Councils approach to development in Shrewsbury as set out within SP14 is sound when considered against the tests set out in para 35 of the NPPF.
A0646	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP15	Yes	Yes	Yes	The Estate considers the Councils approach to development in Shrewsbury as set out within SP15 is sound when considered against the tests set out in para 35 of the NPPF. Suggest that the policy wording could be more ambitious to ensure that the policy does not stifle the ambition or the particular needs and aspirations of an Estate, where the WEP remains complementary to the overall strategic aspirations of the Local Plan, but perhaps goes beyond what the local plan policies anticipate more generally for the rural areas .
A0647	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP4	Yes	No	Yes	25% to be affordable housing, but on SAMDev sites in N Shropshire it is 10%, so the majority of affordable housing is needed to come through Exception Sites. There is an implication that housing in the wider rural area is required to support rural employment, in spite of agricultural declining nationally. DP4 may be used to justify developments in open countryside because they access a school via public transport.
A0647	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Yes	No	Yes	There is no content in the Plan which considers how SP3 or DP11.1 will be implemented. Infrastructure costs of aspects such as Ground Source heating and Community Heat Networks will be less attractive to developers. DP11.4 gives developers the opportunity to opt-out of Low-Carbon developments.
A0647	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Yes	No	Yes	The draft Shropshire Local Plan does not reconcile the differing figures in DP3 (799 per year) and SP2.3 (350 per year). The term "Affordable Housing" is not used consistently throughout the draft Shropshire Local Plan. Unclear if DP3 and DP4 address all affordable housing, or just affordable housing to rent. The Affordable Housing Target and within this an Affordable Rent target are not quantified. DP1.2 indicates Residential Mix for open market dwellings should follow SHMA estimates – no corresponding policy for affordable dwellings.
A0648	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP6	Yes	No	Yes	Whilst we broadly agree with the overall policy, we consider that singling out hot food takeaways as a particular threat to healthy eating is not borne out by evidence. Indeed, research (Robinson et al, 2018) has found that the energy content of full service restaurant meals in the UK tends actually to be higher than take-away meals.
A0649	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Shawbury SHA019	Not Specified	No	No	False promises have been made relating to the recent development adjacent to SHA019. This was scheduled to be 50 houses maximum. Residents have been misled on historic developments. SHA019 has flood issues. Problems with the sewage systems in this area. Ecology and wildlife in this area needs protecting. Dangerous for pedestrians if roads are built around the PROW. There is a possible conflict of interest in relation to the agent, the landowner and his family and their planning backgrounds.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0646	B010	n/a	Shropshire Council welcomes the support for Policy SP14 as part of the employment development strategy for Shropshire which is considered to be appropriate, effective, sustainable and deliverable.	No
A0646	B011	We would suggest the policy could be re-written as follows (suggested amendments in asterix): Whole Estate Plans are a method by which Estates can articulate their long-term vision for their land and premises interests and how these will be achieved. In recognition of the nature of Shropshire, and the potentially important role they play in managing land within the County, Whole Estate Plans prepared by Estates will be endorsed by the Council and used as a material consideration in decision making where they have demonstrated all of the following: a. The objectives, policies and land use proposals of the Whole Estate Plan complement *and do not conflict with* the *strategic* objectives and policies of the Local Plan; b. It has been prepared in collaboration with relevant external organisations, including statutory bodies; and c. It has been subject to meaningful public consultation.	Noted. Shropshire Council considers that it is appropriate to support the preparation of Whole Estate Plans, which provide a positive opportunity for Estates to cover a number of issues based around the central principle of ensuring sustainable land management. The intention is these are used to express a long-term vision and objectives for the way an Estate manages and utilises its land and assets. However, Shropshire Council also considers that it is appropriate for Whole Estate Plans to be endorsed by the Council and used as a material consideration in decision making to have objectives, policies and land use proposals that complement and are consistent with the objectives and policies of the Local Plan.	No
A0647	B001	DP4 1aiii should be deleted. If it is kept, then DP4 should be made consistent with DP5 in terms of the size of development and number of dwellings	Noted. Shropshire Council considers that it is appropriate to allow for appropriate exception sites within/immediately adjoining the built form of a settlement with a school or the ability to access a school by public transport, where such proposals meet the wider requirements of draft Policy DP4, including that there is a proven local affordable housing need, and the wider draft Policies of the draft Shropshire Local Plan.	No
A0647	B002	Ideally, DP11.4 would be removed. If not, the changes should be: 1.Any developers submission must include all government grants which are available to offset capital costs of low-carbon projects 2.Developer submissions must show a 10-year cost of ownership model 3.Selling prices in the submission should be those of similar low carbon homes 4.The annual Carbon emissions of the two alternative developments must be presented.	The Council considers that this policy introduces effective and appropriate policy requirements for new development to contribute to reducing impact on climate change, whilst also ensuring compliance with national policy and legislation and ensuring the continued viability of development. Appendix 4 of the Local Plan shows how policies will be delivered. No change proposed.	No
A0647	B003	This comment covers the structure of the Local Plan and the inconsistencies in it. It is therefore not possible to recommend the correct structure and which are the correct interpretations.	Noted. Affordable housing is defined within the National Planning Policy Framework. The affordable housing figure referenced within the proposed explanation of draft Policy DP3 is the affordable housing need, calculated within the Strategic Housing Market Assessment (SHMA). The figure referenced within draft Policy SP2 is not a statement of affordable housing need, but rather an affordable housing delivery target (this does not distinguish between the different types/tenures of affordable housing as it is not considered appropriate or necessary to do so). It is considered that the proposed affordable housing delivery target effectively responds to the significant affordable housing need identified in Shropshire and best available information on development viability, from within the Shropshire Viability Study. Draft Policy DP3 specifies the tenure mix expected from affordable housing provision as part of market housing development. Draft Policies DP4, DP5 and DP7 indicate that the type, size and tenure of affordable housing should meet local housing needs evidenced in housing need surveys. Whilst Draft Policy DP6 is a mechanism for delivering affordable dwellings for the specific applicant and such dwellings are expected to be designed to meet the current and future households needs (within a maximum dwelling size). Shropshire Council considers that the policy approach to proposed affordable housing is appropriate, effective, sustainable and deliverable.	No
A0648	B001	Either widen part 7 (b) of the policy to include all food and drink uses (Class E, HFT, pubs, pubs with expanded food provision) or delete part 7 (b).	The Council considers that the policy addresses all relevant issues appropriately. No change proposed.	No
A0649	B001	1. The proposed development of SHA019 should be re examined as a preferred location for housing development 2. Alternative developments on a much smaller scale should be considered from those inspected as earlier proposed development sites around Shawbury as part of a modification to the plan. 3. The responsibility to consult with Shawbury Parish Council in identifying a site for further development has not been considered by Shropshire Council equivocally in a transparent way, who announced 1 year ago that non of the identified planning sites had preference.	Shropshire Council has undertaken a robust site assessment process and considers that the preferred allocations are appropriate for the settlement.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0650	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	No	No	No	<p>Clive has dropped below the 48 points which would designate it as a local hub. The shop is now closed and a planning application has been submitted to turn the property into a residential dwelling. Furthermore, points were allocated to a Bowling Club which has now been denied its home on private property and has relocated to a club outside of the village (Preston Brockhurst).</p> <p>What if the shop closes? It was clarified that if the shop was to close during this process (i.e. up until the final plan is submitted to the inspectorate towards the end of this year), then Clive would fall out of Community Hub status. Shropshire Council has to live by the consistent methodology they have adopted. If Clive drops below the 48 point threshold then the village would simply not be a Community Hub.</p> <p>Clive is now below the points threshold and S.C. should honour the commitments made by Mr West and remove Community Hub status.</p>
A0651	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Not specified	Not Specified	Not Specified	Not Specified	Regarding planning for building in Trefonen, surely the extra traffic generated would impact on the bottle neck getting into town passed the Catholic school and Oswestry School. I understand planning permission was recently refused on a plot near to the school due to the congestion it would cause.
A0652	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S18.1 Whitchurch	Not Specified	Not Specified	Not Specified	The site at Hill Valley Golf Course should be included.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0650	B001	Remove the Community Hub status from Clive Village.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." With regard to the Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) we would note that the documents states "As far as possible the assessment report aims to capture all of the outdoor sports facilities within Shropshire. Where pitches have not been recorded within the report they remain as pitches and for planning purposes continue to be so. Furthermore, exclusion of a pitch does not mean that it is not required from a supply and demand point of view." As such, the requirements of para 97 of the NPPF continue to apply. As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0651	B001	n/a	There are no housing allocations for Trefonen. Rather, the housing need for Trefonen is to be met by infill and windfall sites. Therefore any concerns relating to traffic will be considered at the planning application stages	No
A0652	B001	Include the promoted site at Hill Valley Golf Course as a mix-use development, and amend the Development Boundary accordingly.	<p>Shropshire Council considers that the proposed development strategy for Whitchurch and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0653	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Not Specified	No	Not Specified	Clive should not be identified as a Community Hub as two services/facilities identified within the Hierarchy of Settlements Assessment are no longer presented. Specifically the bowling green is located within a private garden (and has been for 2 years) and the village shop has now closed (October 2020) and the owner has confirmed it will not be re-opening. Taking these out would lower its score to 47, meaning Clive would no longer exceed the threshold for Community hub status. The post office operates only 2-4 hours a week and as such does not warrant significant points for this service.
A0654	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP13, DP25, DP27, DP28 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Draft Policy DP25 addresses infrastructure. What contributions are required of BRD030 to ensure sufficient infrastructure is available and if there is a shortfall will Shropshire Council meet the difference? Draft Policy DP27 relates to provision of high quality broadband provision/mobile network connectivity within development. How will this be achieved for Bridgnorth/Shropshire and what guarantees do potential employers have on these matters? Draft Policy DP28 relates to communications and transport. The Local Transport Plan 2011-2026 notes provision of a comprehensive bus service in Shropshire is challenging and most local bus services rely on financial support from the Council. With regard to BRD030, where will 'parking facilities' and 'dedicated park and ride service' be located, how will public transport services be funded and how does this integrate into development north of the A458?
A0654	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14, DP25 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	The current Transport Plan covers 2011-2026 should have been reviewed before decisions made on the draft Shropshire Local Plan. Development and road improvements in and around Bridgnorth are constrained by topography, landscape, pinch points within Bridgnorth and surrounding settlements (including the two bridges over the River Severn which bisects the town), single-carriageways on 'A roads' to surrounding settlements and lack of investment. Roads area also difficult during busy times in the agricultural calendar (due to agricultural nature of the area), this can cause congestion, frustration (and associated accidents), increasing vehicles will exacerbate these issues. Significant in and out commuting from the town occurs (approximately 60% of residents commute out (mainly to Telford, Wolverhampton and Kidderminster) and 60% of jobs are filled by people commuting in). BRD030 is located away from the main employment areas of the town/region (Stanmore, Wolverhampton and Telford) and whilst some employment is proposed on-site, these patterns are likely to continue and apply to this site due to the nature of jobs and level of pay creating further traffic adversely affecting the towns population. What plans are there for road improvements, without which employment development is unlikely to occur. The promoter of BRD030 has stated that they will build a suitable footbridge to enable pedestrians and cyclists to cross the road but do not own land fronting the A458. Why would SMEs and high paid workers wish to located in Bridgnorth due to poor road link and slow access to the motorway network. The A458 is a busy road, future residents of BRD030 would need to cross this road to access the town. The site promoters have stated they will build a suitable footbridge but how can they given they do not own land fronting the A458, it will also remain a long walk (particularly for parents with children). Clarification required on feasibility of this or alternative means of achieving safe crossing points.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0653	B001	Update the Hierarchy of Settlements Assessment to remove the points attributed to Clive for the bowling green and village shop. This results in the settlements score dropping below Community Hub status. Remove Community Hub status from the settlement within the draft Shropshire Local Plan.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No
A0654	B001	Identify 'developer contributions' and any Shropshire Council funding for infrastructure required from BRD030. Identify plans for broadband provision in Shropshire/Bridgnorth and explain how new businesses in Bridgnorth will get appropriate broadband provision. Identify where 'parking facilities' and a 'dedicated park and ride service' will be located on BRD030, how it will integrate with development north of the A458 and how it will be funded.	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policies DP25, DP27 and DP28, unless material considerations indicate otherwise. This is consistent with any development proposal. Furthermore, draft site guidelines for BRD030 identify a number of infrastructure requirements/assessments required to identify infrastructure requirements associated with any potential development of BRD030. Specifically with regard to parking/public transport, draft site guidelines for BRD030 include: "Appropriate public transport links will be provided to the site, this provision will be linked to parking facilities on the site to support wider use. The potential to operate a dedicated park and ride service from this facility will be investigated in partnership with appropriate local community groups and bus operators."</p> <p>Any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The Planning Application process allows for a more detailed consideration of infrastructure requirements and will establish the most appropriate mechanisms for their delivery.</p>	No
A0654	B002	What are the plans for improving the road infrastructure around Bridgnorth and its surrounding areas? As there are no plans to improve roads, employment development is unlikely to occur. Clarification required on feasibility of a pedestrian footbridge over the A458 or alternative means of achieving safe crossing points between BRD030 and the town.	<p>Noted. The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements, unless material considerations indicate otherwise. This is consistent with any development proposal. Consistent with draft Policy DP25, development of BRD030 can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to highway matters, including providing significant and effective pedestrian and cycle links over the A458.</p> <p>Shropshire Council is preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0654	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	In addition to 6.6ha for the relocation of the livestock market and 6.7ha for a business park, the draft Shropshire Local Plan proposes to allocate a further 16ha of employment land at BRD030 and 11ha for expansion of Stanmore Business Park (which is itself currently just over 17ha). This total 40ha of employment land at Bridgnorth. However, Telford is approximately 15 minutes away and has land available for development is close to the M54, has a mainline railway station and is already an industrial hub. Bridgnorth by comparison has poor logistics with no infrastructure and no evidence of future improvements and there is evidence of a lack of demand for employment land, given only 10% of available employment land in Bridgnorth has been developed since 2000. What grounds are there to require 40ha of employment land and why is this considered deliverable? Are all existing units occupied/what is the vacancy rate? How has/will Covid 19 affected current businesses? On what grounds does Shropshire Council believe that the predicted levels of employment growth are achievable? Seems the promoter of BRD030 is using this as a means to hop the bypass and achieve housing that is totally disproportionate, undesirable and detrimental.
A0654	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP18 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	Within the SAMDev Plan, the livestock market was required to re-locate due to incompatibility with proposed housing. Why is development now proposed adjacent to the re-location site. Schedule S3.1(1) for BRD030 (Tasley Garden Village) and the Shropshire Council Cabinet Report 20 July 2020 (Appendix 2) are not compatible with one another re poultry units. At this Cabinet, Officers also discussed a possible legal agreement on this matter no such agreement has been registered, therefore how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences, this would breach draft Policy DP18. It is also possible that BRD030 could be constructed in the vicinity of a livestock market and poultry units. How can odour and noise from the poultry units and livestock market be mitigated? BRD030 is also close to sources of current road and commercial noise and potential future noise. No details are given as to how green infrastructure buffers can effectively manage this issue. No consideration appears to have been given to ground contamination caused by animal waste and run-off from market activities.
A0654	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3. Bridgnorth Place Plan Area (BRD030)	Not Specified	No	Not Specified	Acknowledge that community involvement, as set out in the Council's Statement of Community Involvement (SCI), has taken place to a limited degree. However the late emergence of BRD030 (Tasley Garden Village) means consultation methods used for this and the alternative site at Stanmore Garden Village differ. It would appear that no account has been taken of objections and no public explanation has been given as to why the views expressed have been ignored. A steering group consisting of members of Bridgnorth Town Council and surrounding Parish Councils have considered the issues facing Bridgnorth and developed a plan for the settlement (draft report published in May 2020), around the same time the BRD030 proposal came to light. However this plan does not seem to have been considered by Shropshire Council at all.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0654	B003	<p>What areas / units are already available for occupation and how long have they been vacant?</p> <p>What evidence is there of a need for a further 27ha of employment land in addition to existing SAMDev allocation and what evidence that their delivery is achievable, particularly in the light of Covid 19.</p> <p>If the predicted levels of employment growth are not achieved, how will the land and/or empty buildings be used?</p> <p>What consideration has been given to work patterns/demographics following Covid 19, which will impact on demand for housing/commercial premises/other aspects of life?</p>	<p>Noted. Shropshire Council has undertaken an Economic Development Needs Assessment and Employment Land Review to inform the Local Plan Review. The Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Specifically with regard to employment land, this proposed strategy provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Having a supply of land which creates choice and competition in the market provides flexibility to respond to changing circumstances.</p> <p>Employment allocations are specifically allocated for employment purposes. Draft Policy SP13 indicates that allocated employment land will be protected for employment generating uses and alternative uses will only be supported in specific circumstances, as documented within the draft Policy.</p>	No
A0654	B004	<p>Explain why BRD030 is considered appropriate alongside the livestock market, given its relocation was due to incompatibility with proposed housing.</p> <p>Confirm if there is a legal agreement between the landowner of the land for the proposed Poultry Units and Shropshire Council. If not, how can it be ensured the Poultry Units will not be in operation once development of BRD030 commences.</p> <p>Provide details of how noise and odour can be mitigated in these circumstances.</p> <p>Ground contamination should be assessed.</p>	<p>Noted. The current livestock market site has been allocated as part of a wider site for mixed used development within the adopted SAMDev Plan. Shropshire Council has undertaken a proportionate and robust site assessment process to inform identification of proposed allocations. This includes consideration of noise and odour informed by comments from Public Protection.</p> <p>Ultimately with regard to BRD030 and its location adjacent to the site allocated for the relocation of the livestock market, it is considered that this proximity requires careful and sensitive consideration; however, it is considered that this can be appropriately managed through appropriate design and layout and use of green infrastructure buffering. This is reflected within proposed site guidelines. Any development of this site would also need to comply with the proposed policies of the draft Shropshire Local Plan, including draft Policy DP18 on pollution and public amenity.</p> <p>Proposed site guidelines for BRD030 also require preparation of a vision, design code and masterplan which will be adopted as a Supplementary Planning Document. This process will allow for more detailed consideration of issues such as the appropriate design and layout and use of green infrastructure buffering to manage the sites proximity to the site for the relocation of the livestock market.</p> <p>Furthermore, any site ultimately allocated within the Local Plan still requires an appropriate Planning Permission to be granted before development can be implemented. The specific approach to managing these issues would therefore be determined at the Planning Application stage, where a detailed design and layout for the development and any further necessary supporting assessments would be available. Any Planning Permission may be subject to planning conditions and/or a S106 Legal Agreement, where appropriate to do so.</p>	No
A0654	B005	<p>Explain why views of the elected Shropshire Councillors for the area, the Town Council and the surrounding Parish Councils have been ignored.</p> <p>Delay any decision on the Legal Compliance and Soundness of the draft Shropshire Local Plan until the matters discussed under Soundness have been resolved and any alternative options have been considered in detail.</p>	<p>Noted. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which has considered all sites identified in and around settlements where development guidelines are proposed, including Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0654	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2 and S3. Bridgnorth (BRD030)	Not Specified	No	Not Specified	<p>Bridgnorth is identified as the second largest Principal Centre, would challenge this as there are other towns at least the same size as Bridgnorth which should share the burden of the proposed housing increase.</p> <p>The draft Shropshire Local Plan proposed 2,250 dwellings in the Tasley area (500 on existing SAMDev Plan allocations, 1,050 on proposed allocation BRD030 and 700 on future development land associated with BRD030).</p> <p>At 2020, the population of Bridgnorth was approximately 13,000. Assuming 2 residents per new dwelling (conservative) proposed development equates to 4,500 people a 35% increase in population. It is accepted that Bridgnorth and surrounding areas require more dwellings to cater for likely future growth of the town, on what basis has Shropshire Council decided that such numbers ‘. will make provision for the needs of the town and surrounding hinterland...’?</p> <p>In the absence of a Local Housing Needs Assessment, how has this large figure been arrived at and what evidence is available to justify it/show it meets the needs of the town and demonstrate that the town can support this population increase?</p>
A0655	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	Not Specified	Not Specified	Not Specified	<p>After this consultation, the Plan will go for inspection by a Government Inspector and could be in force in early 2022. However, its timing is very unfortunate as the Government’s new White Paper “Planning for the Future” has many aspirations to simplify these plans and make them more specific. If translated into law, these ideas will quickly render the Plan out-of-date. The main changes would be: a drastic shortening of the Local Plan; identification of all land as “Protected”, “Re-development” or as “Growth land”, where planning permission is not needed; more early stage public consultation; less high level aims; and more specific locally agreed ‘design codes’. There is little in this current review suggesting movement towards these coming changes and this is a lost opportunity.</p> <p>Meantime, the NPPF still applies (although with pending amendments) and this Local Plan has been extended to cover up to 2038. (2 more years than the last draft.) The Plan also includes the Shrewsbury Place Plan and economic growth appears to be the main policy driver. The number of new homes planned for Shrewsbury has also been raised to 8625 (representing another 28% of population). This is some 11% greater than the Government requires although new housing need systems are about to be implemented nationally. These may re-configure governmental requirements upwards for Shropshire, if the White Paper takes effect.</p>
A0655	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	Not Specified	Not Specified	Not Specified	<p>The first (SP1) is called “The Shropshire Test” – an idea taken from the Big Town Plan that identifies 7 main aims that developments should meet. (for example: “Supports the health, well-being and safety of communities”). This is meant to “give a clear indication of the high standards the Council will seek....” 10 are now identified in the Governments “Planning for the Future” document. However, the document assumes that the 7 principles will be taken into account by developers seeking planning permission in Shropshire.</p>
A0655	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	<p>SP2 discusses issues such as different parts of Shropshire, proportions of ‘affordable’ homes and the growing number of Neighbourhood Planning towns. Neighbourhood plans are agreed only after local referenda and eventually gain legal force. Shrewsbury does not have a Neighbourhood Plan but the Big Town Plan is providing planning strategy, although there will be no referendum. Consequently, considerable additional public consultation is enabling townspeople to be involved through many means that are not echoed in the Local Plan’s sister draft policy on Community Involvement. (CSI)</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0654	B006	<p>Establish Local Housing Needs Assessment for Bridgnorth and surrounding areas (to be reviewed every five years).</p> <p>Provide evidence that Bridgnorth can sustain a 35% population increase, particularly with regard to highway capacity.</p>	<p>Noted. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>It should be noted that the potential future direction of growth is not proposed for allocation within the draft Shropshire Local Plan, rather it is identified to provide certainty about the ability to meet future development needs of the town.</p> <p>The draft Shropshire Local Plan should be read as a whole. As such, if adopted, any allocations would need to comply with all policy requirements including those in draft policy DP25 and the existing/proposed site guidelines.</p>	No
A0655	B001	<p>☒ The speed of housing growth is too fast for Shrewsbury. It is highly unpopular and infrastructure is lagging well behind. Without the requirement to co-operate with neighbouring LAs, a reduction (with pro-rata area reductions) in housing numbers is possible. A further extension of the Plan period could help too. The Plan allocates too many houses to be built in Shrewsbury and reduction are possible in the light of BTP "windfall" homes and re-use of a greater number of buildings in and around the town.</p> <p>☒ The Local Plan lacks wording that is specific enough to enforce a high quality of development design. A Design Code is needed for Shrewsbury that would provide certainty for developers of BTP Projects.</p> <p>☒ Shrewsbury residents have few chances to have a say and systems prompting involvement are dated. More of the engagement methods of BTP should be included in the SCI.</p> <p>☒ The Plan timetable is unfortunate in its timing concerning impending National changes to the Planning system and may require major re-adjustments soon. Including elements of coming changes, e.g. categorising land allocations, will provide greater confidence for developers and others.</p> <p>☒ Even without the possible implications of the White Paper, the Local Plan fails to show the influence of other changes, e.g. Permitted Development Rights, Public Consultation (e.g. the belated SCI), and the trends indicated in the Government's National Design Guide, BBBBC's Living with Beauty and the new National ave!</p> <p>☒ The Plan should provide more detail for allocated development sites in terms of meeting sustainability. For example, more estates need basic facilities such as a shop, community centre, medical facility, green transport routes, energy efficiency and high quality distinctive design.</p> <p>☒ New data collections are needed to more accurately assess traffic forecasts for the main routes into Shrewsbury. Only then can infrastructure plans be considered and the viability of development sites.</p>	<p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2.</p> <p>Shropshire Council also considers that the proposed development strategy for Shrewsbury and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations have been identified through a proportionate and robust site assessment process. This included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding and landscape/visual sensitivity.</p> <p>It is considered that the draft Shropshire Local Plan includes appropriate policies on design.</p> <p>Shropshire Council considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement, Gunning Principles and national legislation.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p>	No
A0655	B002	The principles appear very open to interpretation and consequently unenforceable.	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. The draft Shropshire Local Plan should be read as a whole, together the proposed draft Policies are considered to provide an appropriate framework for the future development of Shropshire to 2038.</p>	No
A0655	B003	none given	<p>Noted. Shropshire Council consider that it has appropriately and effectively engaged as part of the Local Plan Review process and as part of wider processes that have informed the draft Shropshire Local Plan.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0655	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Not Specified	Not Specified	Not Specified	SP3 addresses issues concerning Climate Change. However, while Shropshire Council has agreed a "Climate Emergency" and has a partnership seeking ways to reduce CO2 emissions, this is hardly mentioned in SP3. It is notable that several experts in the field have assessed this Policy as inadequate to provide zero emission by 2036.
A0655	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	Not Specified	Not Specified	Not Specified	SP4 seeks to address issues of Sustainable Development, which in the NPPF has three aspects: Visual, Social and Environmental sustainability. These are not identified in the Draft Local Plan and so it lacks the detailing that might prompt better sustainable living for future residents.
A0655	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Not Specified	Not Specified	Not Specified	SP5 is seeking to "ensure the creation of better places" through "High Quality Design". It adopts the West Midlands Combined Authorities Design Charter which is a well-drafted set of over-arching principles for designing developments. There are some 14 principles (e.g. "Opportunities for solar gain are maximised where possible".) Planning applications are meant to set out "how the principles have been considered". These requests lack specificity and exemplification and consequently the Charter failed in the quest for better design. The White Paper "Planning for the Future" also seeks much firmer guidance, following on from the report of the "Building Better – Building Beautiful Commission". Planning reforms are likely to require Local Plans to be shorter, more specific and to include unambiguous "Design Codes". The recent "National Model Design Code" attempts to show how to devise a Design Code and to re-iterate the expectation that LPAs will develop them.
A0655	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP24	Not Specified	Not Specified	Not Specified	DP24 seeks to conserve and enhance designated and non-designated heritage assets. This policy recognises the importance of Shropshire's heritage assets. However, it too lacks the specification or illustration that is needed to clarify issues such as degrees of harm to an asset and loss of significance. It states how proposals that will deliver positive benefits to heritage assets will be supported. However, it lacks a facility for robust refusal where harm will affect the asset and instead discusses mitigation measures. Nevertheless, there is reference to more detailed supplementary planning guidance.
A0655	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16	Not Specified	Not Specified	Not Specified	S16 makes only passing reference to the Town's highly unusual architectural and heritage richness. This Place Plan has categories concerning housing development, retail improvement, industry and employment, etc., but none for heritage enhancement or protection – the very aspects that make the town an enduring visitor destination. This is in spite of the fact that Shropshire Council owns several of the town's heritage asset buildings that are in poor repair. In a previous version of the Local Plan, housing allocations for the town of Shrewsbury took account of the Big Town Plan's aspirations of "Balanced Growth" and how there were opportunities for many homes within the very centre. There had been an allocation of some 1400 new homes that would effectively be "windfall" homes reducing the overall need for the Shrewsbury Place Plan. The latest version of the Big Town Plan estimates a possible 1904 units just for the master-planned Centre. It takes no account of the areas between the centre and the fringe estates but some of these would reuse existing buildings with retro-fitting and so contribute to the Council's Climate Emergency aims. A similar over-allocation may be made for employment provision, especially when there is likely to be some a reduction (20%) in demand for office space, since the pandemic, etc. Many of the fringe sites allocated for housing, were already in previous version of the Plan. However, experience suggests that communities are very concerned about the quality and facilities they provide. Many recent site applications provide insufficient quality in terms of access, community provision (shops or etc), energy efficiency and distinctiveness of building design. We have seen how such features can be required only if they are entered into the site allocation plan. New trends of home-working and green travel suggest that larger estates will need considerable upgrading of local facilities. This needs addressing in the Plan now. Without such basic facilities generations are being relegated to inappropriate places to live.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0655	B004	It is notable that several experts in the field have assessed this Policy as inadequate to provide zero emission by 2036. This is already given attention within the NPPF in terms of sustainability, but now needs much stronger detailing about CO2 emissions, including construction methods, materials and future energy use.	The Council considers that the approach taken to climate change and reducing carbon emissions throughout the Local Plan is appropriate and consistent with national planning policy and guidance and all other relevant legislation. No change proposed.	No
A0655	B005	SP4 seeks to address issues of Sustainable Development, which in the NPPF has three aspects: Visual, Social and Environmental sustainability. These are not identified in the Draft Local Plan and so it lacks the detailing that might prompt better sustainable living for future residents.	The draft Shropshire Local Plan seeks to achieve the sustainable development of Shropshire. All references to sustainable development within the draft Shropshire Local Plan recognise the three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). This is recognised within the introduction to the draft Shropshire Local Plan, which states "the pursuit of sustainable development is at the heart of the planning process" and that "achieving sustainable development will mean that decision takers must look at all facets of sustainability in arriving at decisions: economic, social and environmental. In all cases a balance of considerations is needed, and it is accepted this will often lead to a variety of opinions being expressed." The proposals within the draft Shropshire Local Plan have been informed by a comprehensive Sustainability Appraisal process. Draft Policy SP4 is not seeking to define sustainable development, rather it is providing clarity on how the presumption in favour of sustainable development introduced within the NPPF would apply, if relevant, in Shropshire.	No
A0655	B006	Now is the time to elevate standards by robustly wording policies to ensure they have real lifetime impact.	Noted. Shropshire Council have endorsed the West Midlands Combined Authority (WMCA) Design Charter and acknowledged that this can be taken into account as a material consideration to inform planning decisions and to inform policy development, notably the review of the Local Plan. It is considered the principles established within this Design Charter are appropriate in a Shropshire context. This aspect of draft Policy DP5 is complemented by the remainder of draft Policy DP5, the other draft Policies within the draft Shropshire Local Plan and the NPPF. Furthermore, the draft Shropshire Local Plan also, where appropriate, specifies that for large development sites such mechanisms as Supplementary Planning Documents (SPD's) will be used to identify more detailed and location/site specific design considerations.	No
A0655	B007	DP24 lacks the specification or illustration that is needed to clarify issues such as degrees of harm to an asset and loss of significance. It states how proposals that will deliver positive benefits to heritage assets will be supported. However, it lacks a facility for robust refusal where harm will affect the asset and instead discusses mitigation measures	The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that the policy thus makes appropriate provision for the effect of development outside the AONB on the designated area. No change proposed.	No
A0655	B008	S16 makes only passing reference to the Town's highly unusual architectural and heritage richness. This Place Plan has categories concerning housing development, retail improvement, industry and employment, etc., but none for heritage enhancement or protection – the very aspects that make the town an enduring visitor destination. This is in spite of the fact that Shropshire Council owns several of the town's heritage asset buildings that are in poor repair. In a previous version of the Local Plan, housing allocations for the town of Shrewsbury took account of the Big Town Plan's aspirations of "Balanced Growth" and how there were opportunities for many homes within the very centre. The latest version of the Big Town Plan estimates a possible 1904 units just for the master-planned Centre. It takes no account of the areas between the centre and the fringe estates but some of these would reuse existing buildings with retro-fitting and so contribute to the Council's Climate Emergency aims. A similar over-allocation may be made for employment provision, especially when there is likely to be some a reduction (20%) in demand for office space, since the pandemic, etc. Many of the fringe sites allocated for housing, were already in previous version of the Plan. However, experience suggests that communities are very concerned about the quality and facilities they provide. Many recent site applications provide insufficient quality in terms of access, community provision (shops or etc), energy efficiency and distinctiveness of building design. We have seen how such features can be required only if they are entered into the site allocation plan. New trends of home-working and green travel suggest that larger estates will need considerable upgrading of local facilities. This needs addressing in the Plan now. Without such basic facilities generations are being relegated to inappropriate places to live.	Noted. The Plan should be read as a whole, and it is considered several policies pick up on many of the issues raised by the objector. The Big Town Plan and its associated documents continue to be developed, and it is the role of the Shropshire Local Plan, and in particular policy S16.1 to provide an appropriate cross reference to this work to support it as a material consideration in decision making as appropriate. No change is proposed to the policy.	no

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0655	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 SHR145	Not Specified	Not Specified	Not Specified	SHR 145 is an unwelcome addition to Schedule S16.1 (i) and we have had both pre-app talks and objected to a planning application here. The site could have several other uses but it is inappropriate for a small housing estate. This is because it would be 'islanded' without easy access routes apart from heavily used traffic roads. We think it is a suitable site for development but not for homes. The allocation of 150 dwellings may be found within the large, unaccounted "windfall" developments, likely to be made available from Big Town Planning and from the additional "windfall" dwellings created out of the town centre but not at urban extensions.
A0655	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1 SHR173	Not Specified	Not Specified	Not Specified	SHR173 is a puzzling addition to the allocated development sites, ostensibly for 500+ houses. Our concerns about the sufficiency of facilities on fringe estates (as above) are not fully met in plans for this site. We presume that the fact that this site is listed as dependent upon the NWRR, is due to possible additional pressure on Ellesmere Road. Earlier conclusions about traffic were questionable concerning congestion along Ellesmere Road. The data that drives those conclusions is now dated and needs re-assessment, due to additional pressure on the Coton Hill Junction, and from several more recent developments along the road, as well as pandemic-driven changes. Up-to date, evidence-based forecasts are necessary.
A0656	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	Not Specified	Not Specified	Not Specified	The SWDPR does not require any of South Worcestershire's housing, or other development needs, to be met within Shropshire. It should be noted that the emerging SWDPR is proposing 4 site allocations in Tenbury Wells (3 re-allocations and one new allocation) for a combined total of 180 dwellings. Support the general approach in the LPR of focusing development in the larger urban areas where there is typically better access, especially for those who don't have access to a car, to existing infrastructure and services. It is recognised that there needs to be some development in rural areas and the SWC support the principle that development in these areas is distributed according to the hierarchy of settlements, subject to an assessment of the ability of those settlements to provide services and facilities. The SWC consider that good access to rail stations should also be a factor in the identification of strategic housing allocations. With regard to the proposed development requirements in close proximity to the Malvern Hills District administrative boundary, it is noted that Ludlow has a railway station, but it is considered that Burford and Cleobury Mortimer are not well served by rail and we would like to see the transport evidence which shows that there is no material impact on road junctions in Malvern Hills District.
A0656	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S10.2 Burford	Not Specified	Not Specified	Not Specified	There is concern about the proposed allocation of site BUR002 (land adjoining Lineage Farm on A456). The site scores poorly in the SA. Further, liaison with Tenbury Town Council has also highlighted concerns about the loss of a flood plain and potential flooding problems if site BUR002 was to be developed. Liaison with Tenbury Town Council has also highlighted that an additional 190 dwellings at Burford (which probably equates to around an additional 440 residents) would place additional demands on existing services, such as doctors, at Tenbury which are presently stretched. The impact on local services at Tenbury needs to be taken into account in any housing allocations at Burford. Whilst Tenbury Town and Burford Parish Council's have not yet undertaken Regulation 14 consultation on their emerging Tenbury and Burford NDP, it is understood that a NDP is still being prepared. It is considered that the Shropshire Local Plan needs to recognise that Tenbury and Burford is a designated Neighbourhood Area and reflect the current position with regards to the emerging NDP.
A0657	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16 ELR006	Not Specified	Not Specified	Not Specified	The Local Plan Review Map continues to allocate the ABP Plant and much of the surrounding area as a 'Protected employment Area', and the land north of the site, ELR006, as a future Employment area. ABP would be in support of these land-use allocations. the Company supports the plan provisions with respect to the 'Protected Employment Area' at Battlefield Road. Nevertheless, ABP remains extremely concerned with potential encroachment of non-employment uses towards its Plant. Amongst the reasons for this concern is the potential for future conflict due to non-compatible land-uses encroaching on the Plant. ABP considers non-compatible land-uses to include uses that attract significant numbers of the general public to the area and would include uses such as restaurants, retailing, car-showrooms and hotels. As previously stated, ABP is a very important employment provider in the area and it is fundamental to ensure this employment is retained. The Company supports the proposed employment land-use allocation north of the ABP Plant (ELR006).



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0655	B009	Remove SHR145 as a housing allocation	Noted . it is considered the proposed allocation of SHR 145 has been through a robust site assessment process and represents a sustainable option for the town's growth. No change proposed	No
A0655	B010	The data that drives the sites' conclusions is now dated and needs re-assessment, due to additional pressure on the Coton Hill Junction, and from several more recent developments along the road, as well as pandemic-driven changes. Up-to date, evidence-based forecasts are necessary.	Noted. Shropshire Council considers that the proposed development strategy for Shrewsbury and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying proposed site allocations a comprehensive site assessment process has been undertaken, including consideration of this promoted site.	no
A0656	B001	not specified	Noted.	No
A0656	B002	SWC have prepared an emerging housing requirement for Tenbury Wells. It is considered that it would be helpful for Shropshire Council and the South Worcestershire Councils to liaise to jointly agree a housing requirement for the Tenbury and Burford Neighbourhood Area.	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Burford. Consequently, it is considered appropriate that Burford is identified as a proposed Community Hub and it is further proposed to identify a development guideline of 190 dwellings, a development boundary and housing allocations on sites BUR002 and BUR004 (it should be noted that site BUR001 is now under construction for a mixed tenure affordable housing scheme). The designation of Burford and the scale of the proposed housing development reflects the additional service provision in the adjacent town of Tenbury. Consequently, the development guidelines for sites BUR002 and BUR004 should recognise that where development in Burford is required to make a contribution towards sustaining key local services, this might also include services located in Tenbury. The development guidelines for the proposed allocation on site BUR002 already recognises a possible long term flood risk from the River Teme and the development guidelines for BUR002 provide for flood storage improvements including an open space buffer, an infiltration basin and other flood storage measures which mitigate this potential risk. The draft Shropshire Local Plan was prepared at a time when the communities of Burford and Tenbury proposed to prepare a Neighbourhood Development Plan (NDP). The preparation of the draft Shropshire Local Plan has preceded the preparation of the NDP and met the development needs of Burford with no further provision required in Burford at this time. In the event that the South Worcestershire Plan should be preceded by the NDP then the development needs of Tenbury may still be met through the NDP. This matter will be resolved in part through the SOCG with Malvern Hills District Council.	Yes
A0657	B001	An explicit policy reference to ELR006 (Employment land allocation north of ABP) and SHREW09-115 (Housing Land Allocation North of ABP) that access to and use of these new development areas must take full account of existing employment uses and employment allocations to the south, including ABP and not in any way impede or be detrimental to the operational requirements of the ABP Plant, including any aspects of access and egress to the public road network. ABP requests that any proposed access to Battlefield Road from the ELR006 land allocation would be such as to not impede any traffic movements to or from the ABP facility as the access / egress to the ABP facility is only a short distance to the south of these new land-use allocations and the Company is conscious of the number of junctions onto this section of Battlefield Road. ABP does not object to the new housing allocation SHREW095-115 but requests development proposals in this area, including access, design of dwellings and layout of development proposals should be such as not to impede or cause any detriment to the operational requirements of the ABP Plant.	The comments are noted. However, no changes are proposed to the wording of this policy.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0658	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	No	No	Not Specified	We consider that the interim uplift proposed by the government in their recent proposals for the Buildings Regulations should be required by Policy DP11. The PPG states that there is no restriction on requiring an uplift in standards for non-residential property and in our view, it is not necessary nor appropriate to apply the viability test to non-residential development and therefore Paragraph 4 should not apply to the requirements of Paragraph 2. Our experience from the operation of the previous version of the SAMDev Local Plan was that where policies were optional based on words like encouraging and maximising, such uplifts in environmental performance standards rarely happened. We recognise that viability of the development is an issue, including affordable housing but the future viability of our planet has to be considered as a first priority and it should be recognised that mitigating climate change is a statutory requirement. In our experience, with hundreds of existing homes it is very difficult and sometimes practically impossible to raise energy efficiency standards of buildings constructed under the many previous energy efficiency codes. To carry on building developments that do not meet improved standards would be damaging to our climate and not in accordance with the overall statutory duty to mitigate climate change. For Policy DP11 two criteria are put forward, amongst others, that will not provide any future data as they rely on Feed in Tariffs which were abolished at the end of March 2019. It is clear that the monitoring arrangements for this Policy which has no targets for reductions in carbon dioxide emissions nor production of renewable energy need to be reviewed and improved. We submit that without the modifications we have put forward, Policy DP11 is unsound and not in compliance with statutory duty contained in Section 19 of the Planning and Compulsory Purchase Act 2004 as amended as it would not adequately mitigate climate change.
A0658	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP23	No	No	Not Specified	There is no requirement in this Policy to incorporate energy efficiency and renewable energy into works relating to Shropshire's heritage assets. While it could be inferred that Policy DP11 applies to these proposals, it should be made explicit by the inclusion of an additional paragraph to this effect: All such proposals will incorporate wherever appropriate the sensitive retrofitting of energy efficiency measures and renewable energy and heat sources. A revised supplementary planning document should positively guide the incorporation of such measures. This change is necessary in the context of the Guidance in the NPPF paragraphs 149 and 151 and in accordance with statutory duty set out in Section 19 of the Planning and Compulsory Purchase Act 2004 as amended to ensure that, taken as a whole, the plan policy contributes to the mitigation of climate change.
A0658	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP26	No	No	Not Specified	Policy DP26 does not define what is meant by microgeneration turbines but in a recent appeal decision in Wychavon District Council, turbines with a rotor diameter of 13.1 metres and a tip height of 25 metres were considered to be micro turbines. (Appeal ref APP/H1840/W/20/3249183). We assume in our statement that this is what Shropshire Council intended to be covered by the exemption as no definition is provided. On the face of it, it might appear that DP26 does conform to Paragraph 151-153 of the NPPF together with footnote 149. However, our case is that Shropshire Council had adequate time and opportunity to define which areas of the County might be suitable for wind power and provide positive strategy for energy from wind power as required by Paragraph 151 (a) rather than the negative and restrictive approach they have adopted. The potential for wind power in the County is high and it is a component of renewable energy in Shropshire that is so important that to exclude such development from the local Plan results in an unsound Plan. Furthermore, as Section 19 of the Planning and Compulsory Purchase Act 2004 as amended requires that taken as a whole, plan policy contributes to the mitigation of climate change. Clearly this duty does not mean just one plan policy contributes to the mitigation of climate change. Neither does it state that every plan policy must contribute to mitigating climate change. Our view is that the potential for generating wind power is of more than county wide significance, it is of regional significance and that effectively preventing its development in the Plan means that it is in breach of this statutory duty. It appears that the Council intend the policy as drafted to result in an effective ban on wind energy developments except for micro turbines but in practice it may result in some uncertainty if the Appeal decision in Wychavon is followed by other Inspectors. No early, proportionate and effective engagement between plan makers and local organisations has taken place with Shropshire Council re climate change. Our response was excluded from the previous consultation summary. Previous comments from us being ignored has ultimately seemed to us a deliberate policy to suppress any comments relating to climate change issues and ensure that members of the public and members of council were kept un-informed on this issue. On 3 August 2020 Shropshire Council published the Regulation 18 pre-submission draft of the Local Plan. The Plan contained no Policy in relation to wind power and there were no documents of evidence lodged relating to wind power. This was surprising in the context of the previous statements and we submitted a FOI Request on 1st September 2020 to discover how this omission had occurred. Of the potential renewable energy over 9GW was from wind power-mostly large-scale turbines in Shropshire. This shows that this resource is of regional importance as well as countywide importance. Without enabling the development of wind power in Shropshire it cannot be justified that the Shropshire Local Plan has a positive strategy for renewable energy as required by the relevant paragraphs of the NPPF and the PPG and the Local Plan should be assessed as unsound. Overall Policy DP26 has a negative approach to renewable energy with basically a checklist to set out all the reasons it should not proceed. This is not the required positive approach to mitigating climate change as required by Section 19 of the Planning and Compulsory Purchase Act 2004 as amended. We submit that the Plan as submitted is in breach of this statutory duty.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0658	B001	<p>Modify Paragraphs 1(a) and 1(b) to read:            "1. New residential development will contribute to reducing the impact of climate change in accordance with Policy SP3 by:            a. Being designed to achieve levels of energy efficiency higher than the 2013 Building Regulations including such measures as: building orientation; high levels of insulation of roofs, floors and walls; airtightness and using solar gain through window/door orientation whilst avoiding overheating and:            b. Ensuring all proposals for dwellings achieve a minimum of 31% reduction in the generation of carbon emissions compared to the requirement in Part L of the 2013 Building Regulations and improve fabric efficiency as set out in the proposed interim uplift to Building Regulations, until such time as the Building Regulations are increased to a level which meets or exceeds this uplift and:"            Modify Paragraph 4 to read:            "4. The requirements expressed in paragraphs 1 (c) and 1(d) and paragraph 3 of this policy will apply unless it is demonstrated through open book accounting that they would make the development unviable, having regard to the policy requirements of the Local Plan, in particular the delivery of affordable housing."</p>	<p>Although the government announced its intention to amend Subsection 1 (c) of the 2008 Planning and Energy Act in 2015 - which states that Local Planning Authorities may include policies imposing reasonable requirements for 'development in their area to comply with energy efficiency standards that exceed the energy requirements of the building regulations' - these amendments have not yet been enacted. The intention of the amendment was to introduce higher energy performance requirements through building regulations, rather than the planning system. The performance increase was expected to be a 19% improvement. This improvement is also referenced in national policy through the 2015 Written Ministerial Statement - being equivalent to the Code for Sustainable Homes level 4 energy criteria which the Statement permits. However, the government's 2015 Productivity Plan subsequently stated that 'the government does not intend to proceed with .....the proposed increase in on-site energy efficiency standards, but will keep energy efficiency standards under review recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.' Recent government consultations on the Future Homes Standard and Future Buildings Standard indicate that such a review is ongoing with the outcome forming part of changes to Part L of the Building Regulations. However, these changes have not yet been made. Thus the Council believes that the powers afforded to LPAs through the 2008 Planning and Energy Act to set energy efficiency standards in new homes still exist and that this policy's requirements are appropriate. Provision is also made in the policy for higher Building Regulations standards to apply if/when these are implemented. No change proposed.</p>	No
A0658	B002	<p>Insert additional Paragraph 8:            All such proposals will incorporate, wherever appropriate, the sensitive retrofitting of energy efficiency measures and renewable energy and heat sources.</p>	<p>Proposals for the retrofitting of energy efficiency measures and for the installation of renewable energy systems on or affecting heritage assets would be assessed against this policy as and when they come forward. The Council does not consider it necessary to encourage such proposals and as such does not propose any changes to the policy.</p>	No
A0658	B003	<p>To provide for the development of wind power in the Shropshire Local Plan could only be achieved by a resubmission of this part of the Shropshire Local Plan after necessary studies and consultations are carried out. Stretton Climate Care does not wish to delay adoption of the Local Plan if an urgent partial review of the Local Plan would be carried out to address the issue of wind power with adequate studies and consultation. We would need assurances that Shropshire Council would pursue this matter without delay and without a prior determination to prevent all or most wind power developments.</p>	<p>The Council considers that the requirements of this policy are consistent with national planning policy and guidance and that as such, no change is required.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0659	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S5.1	Yes	No	Yes	The housing guideline for Church Stretton is too high. There is no justification for the increase windfall number. We consider that the higher windfall estimate of 121 is not achievable or not achievable without breaching NPPF guidance on the development limitations within an AONB. Therefore the plan is UNSOUND because it is not deliverable and not consistent with national policy. The decision to re-allocate the 70 dwellings from the Snatchfield site allocation to windfall is contrary to previous practice and precedent when the numbers of houses for sites that have been de-allocated or removed have been deleted from the overall target for Church Stretton. The guideline for housing in Church Stretton was reduced from 250 in the 2018 preferred sites consultation to 200 in the Regulation 18 draft plan partly because of the deletion of the Gaerstone site (CSTO20) from the draft version of the local plan and partly because the school housing site (CSTRO18) in the current SAMDev Local Plan was de-allocated when the developer withdrew the planning applications. Because the figure of 200 for Church Stretton is a target it should be fully justified by proportionate evidence and capable of delivery without breaching national policy. These essential tests of soundness are not met. The Windfall section of the target, 121 dwellings, is undeliverable because it exceeds a reasonable expectation from small scale Brownfield development within the residential boundary. In effect the target relies on possible exception sites under policies DP4 and DP7, Affordable Housing Exception and Cross-subsidy schemes, none of which are identified. Policy S5.1 states that the 200 dwellings will enable Church Stretton to contribute towards strategic growth objectives in the south of the County. As a town in the AONB this is inconsistent with the general thrust of NPPF. There is a general assumption that there is a need in Church Stretton for more affordable homes, but there has been no assessment of the need for and supply of affordable housing.
A0660	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Not specified	Yes	No	Yes	The Stage 3 site assessment of our clients' land – identified as site reference CST021 in Appendix F – highlights some technical considerations that would need to be addressed should a planning application be brought forward, such as ecology/botanical, heritage and tree matters, but raises no site-specific or unassailable issues with regard to its deliverability. The reasons for excluding it as a housing allocation are vague and consist of the Council's recent stance that the residential guideline for Church Stretton can be achieved through a combination of windfall sites within the town's development boundary and through the delivery of exception and cross-subsidy affordable housing sites. We believe it is noteworthy that all other sites that are discounted in Appendix F are considered to have site-specific constraints or issues that prevent them from being allocated in the Local Plan, as set out in the 'Reasoning' box for each site. Put another way, the Council has not been able to identify such issues with our clients' land but nevertheless reaches the conclusion that it should not be allocated. It is submitted that this is a flawed assessment and that insufficient reasoning has been given to reject the land at Snatchfield Farm. While we do not believe that modifications necessarily need to be made to the Sustainability Appraisal as the overall conclusions regarding our site are not inherently negative, we believe it is important for the Council to consider our representation in advance of the Local Plan being submitted for examination or, ultimately, for the examining Inspector to understand our position. Finally, we consider that an identified need exists to allocate major residential development within the Shropshire Hills Area of Outstanding Natural Beauty and that bringing forward such development on land at Snatchfield Farm will be in the interest of existing and future residents, particularly in providing a meaningful contribution towards the local area's market and affordable housing needs and helping to sustain the vitality of Church Stretton and its role as an important Key Centre. The scope for developing outside of this designated area is limited in our opinion due to the town's location at the heart of the AONB remote from other settlements of any reasonable size, i.e. other settlements are too distant to directly meet the needs of Church Stretton and its hinterland.
A0660	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S5.1	Yes	No	Yes	Our clients' site – otherwise known as Snatchfield Farm – was unexpectedly removed from the draft Local Plan following the end of the Regulation 18 consultation stage. We therefore no longer support the council's approach to the delivery of housing in Church Stretton. The new strategy will not meet the area's objectively assessed needs and is not backed up by proportionate evidence to demonstrate that sufficient supply will actually emerge or be delivered from the sources suggested (windfall, cross-subsidy). New housing development has to occur at Church Stretton itself if its vitality, self-sufficiency and role as a Key Centre are to be maintained into the future. We are of the firm belief that our clients' land at Snatchfield Farm is the only logical location outside the development boundary to build new housing to serve the needs of the town without an underlying constraint preventing the site from being developed. If alternative sites did come forward elsewhere, such as within the development boundary, then these are still only likely to deliver the 48 new windfall homes in our view. Once these sites have been exhausted, we can see no evidence within the draft Local Plan or its supporting evidence base to suggest that a further 71 dwellings will be delivered from cross-subsidy and exception development. We respectfully submit that the Town Council and local opposition group are wrong to suggest that sites CST019VAR, CST035, or the school playing fields are reasonable and, perhaps more importantly, developable and deliverable alternatives when such an assertion ignores the constraints and problems affecting these parcels of land.
A0660	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S5.1 CST021	Yes	No	Yes	Once we established the planning permissions or prior approval applications that have now expired and therefore are no longer capable of being implemented, we can confirm that 62 dwellings is an accurate figure of what could feasibly be delivered in the near future. In short, we accept that the windfall allowance for Church Stretton over the period of the emerging Local Plan is 121 dwellings. Following 20/00956/FUL being granted, the most up-to-date windfall requirement for Church Stretton at the time of writing is 119 dwellings. Question whether there is compelling evidence that past windfall delivery rates will continue at the same rate into the future, particularly in the context of a landscape sensitive settlement such as Church Stretton where speculative or redevelopment opportunities become increasingly scarce as previous sites are built out. The same point applies to cross-subsidy and exception development, i.e. suitable and available sites still need to exist in order for new housing to be delivered from this source of supply.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0659	B001	<p>Changes required to make the Plan for Church Stretton SOUND.</p> <p>a) S5.1, paragraph 2 should be revised as follows: The role of Church Stretton as a Key Centre will be maintained by providing 130 dwellings and around 2ha of employment development. New housing and employment development should respond to identified local needs within the AONB and conserve and enhance local landscape and settlement character.</p> <p>b) The Residential Guidelines and Supply for Church Stretton (Appendix 5) should be revised as follows: Residential Development: 130 Completions 2017-2019: 17 Sites with permission 31.3.19: 62 Windfall: 51</p> <p>c) A robust estimate of the requirement for exception site land outside the boundary for affordable homes and the ability to provide them within the timescale of the plan is required (S5.1.3). We suggest this needs survey should be carried out by Shropshire Council and the Town Council with assistance sought from the relevant housing associations.</p>	<p>Shropshire Council considers that the proposed development strategy for Church Stretton and the existing commitments (including the existing allocations) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities, including its location within the Shropshire Hills AONB.</p> <p>With regard to demand for affordable housing, Shropshire Council would highlight that there are currently 88 households on the HomePoint housing waiting list which have identified a first preference to live in Church Stretton, of which 78 have indicated at least one local connection to the town (a breakdown of the bedroom number requirements for these is as follows: 37 x 1 bed; 26 x 2 bed; 14 x 3 bed; and 1 x 4 bed).</p> <p>We would also note that Church Stretton Town Council have recently undertaken a housing survey for Church Stretton town, which was supported by Shropshire Council.</p>	No
A0660	B001	Correction of the SA score for CST021	<p>Shropshire Council considers that the proposed development strategy for Church Stretton and the existing commitments (including the existing allocations) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities, including its location within the Shropshire Hills AONB.</p>	No
A0660	B002	<p>Our clients' land, which was previously allocated for 70 dwellings, will still be essential if the Council truly wishes to meet its target of delivering 200 dwellings at the town. Put simply, we urge the Council to re-allocate the land at Snatchfield Farm for residential development before the draft Local Plan is submitted for examination.</p>	<p>Shropshire Council considers that the proposed development strategy for Church Stretton and the existing commitments (including the existing allocations) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities, including its location within the Shropshire Hills AONB.</p>	No
A0660	B003	<p>Suggested modification to Policy S5.1 – Re-introduce the allocation of land at Snatchfield Farm (CST021) for up to 70 dwellings.</p>	<p>Shropshire Council considers that the proposed development strategy for Church Stretton and the existing commitments (including the existing allocations) and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed strategy has had due regard to the settlements specific characteristics, constraints and opportunities, including its location within the Shropshire Hills AONB.</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0661	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	No	<p>Consider the decision to undertake Regulation 19 consultation on the draft Shropshire Local Plan fails the test of soundness and is not consistent with legal requirements (including the duty to cooperate and Gunning Principles) as:</p> <p>A.The Planning Inspectorate Procedure Guide for Local Plan Examinations (PINS Guide) makes clear Plans should identify and provide policies to address all matters which need to be planned for (paying careful attention to deliverability and viability) and all necessary matters should be addressed as far as possible and not deferred to a future update/Inspector relied on to address them. However the Regulation 19 draft of the Shropshire Local Plan explicitly acknowledges all necessary information has not been provided in the document bundle before community consultation (Statements of Common Ground with relevant bodies and at least 10 further items, including strategic assessments, justifications, and plans should be included in the SLP evidence base). It is not possible for communities to make informed comment on required information that has not been made available.</p> <p>B.The Regulation 19 draft of the Shropshire Local Plan has not been positively prepared to achieve sustainable development as: 1.A Local Housing Need Assessment has not been carried out for the Bridgnorth Place Plan Area. A Housing Need Assessment produced in 2006 and extrapolated forward concluded 15,168 dwellings would be needed compared to the 16,200 proposed by the draft Local Plan at the time. This has not been reflected in the Regulation 19 draft of the Shropshire Local Plan. 2.Statements of Common Ground have not been agreed with other Local Authorities under the Duty to Cooperate. No evidence to indicate other Local Authorities have completed their own housing need assessments. A decision was made to accept 1,500 dwellings from the Association of Black Country Authorities (ABCA), however this has not been justified, ABCA does not adjoin Shropshire and this need may be more appropriately met in Telford and Wrekin. No evidence has been provided of agreements regarding financial contributions to meet additional infrastructure costs of these 1,500 dwellings. 3.No justification is provided for the housing requirement exceeding housing need by a 19%.</p> <p>C.The Regulation 19 draft of the Shropshire Local Plan is not justified as the most appropriate strategy as: 1.It does not demonstrate all reasonable alternatives have been considered (The 2020 Bridgnorth Plan submitted during Regulation 18 consultations demonstrates a reasonable alternative but no evidence this community-led plan has been reflected) and the viable option to convey existing business premises to residential should also be considered, this would be more sustainable particularly given the impact of the Covid-19 pandemic. Sufficient proportionate credible evidence has not been provided and some documents are missing. There is a fixation on a garden village by a national housebuilder, but this is not the only option or right for the town. 2.Tasley Garden Village (BRD030) was preferred over the alternative site at Stanmore Garden Village as it is not located in the Green Belt, so had to be considered a viable alternative. This sounds rational but Green Belt is intended to stop urban sprawl from the West Midlands, yet BRD030 represents urban sprawl between Bridgnorth and Much Wenlock on high-quality agricultural land the wrong side of the A458. As such it cannot be considered a reasonable alternative. 3.Proposals cannot be justified when at least 10 evidence base documents including strategic assessments, justifications, and plans have not been provided. 4.Requested engagement with the community has not occurred during this or previous Regulation 18 consultations (no community meetings, even virtual ones). 5.The SAMDev Plan for Bridgnorth evidences little employment land delivery over the previous plan period. No credible evidence is provided as to how the proposed new supply will be delivered set against existing allocations. Employment land is noticeably absent from the Viability Assessment undertaken to inform the draft Shropshire Local Plan.</p> <p>D.The Regulation 19 draft of the Shropshire Local Plan is not effective because it is most likely not deliverable as: 1.Levels of housing and employment proposed in the Bridgnorth Place Plan Area appear well in excess of previous delivery levels. No evidence is provided to identify market capacity to absorb proposed levels of development. It is also unclear whether employment keeps pace with housing. 2.No evidence is provided that a 'Garden Village' approach is appropriate for the area. The Viability Assessment undertaken to inform the draft Shropshire Local Plan looks at both BRD030 and the alternative site Stanmore Garden Village as potential 'strategic sites' and suggests they may be financially viable, however this is subject to a caveat that the Council is still working up the assessment of the strategic infrastructure and mitigation requirements and as such it represents a best estimate. As such its value is low in the absence of an Infrastructure Plan and Strategic Transport Assessment for the Bridgnorth Place Plan Area.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0661	B001	<ol style="list-style-type: none"> <li>1. Adopt the community-led Bridgnorth Plan into the draft Shropshire Local Plan in lieu of unilaterally imposing a Garden Village model in the Bridgnorth area.</li> <li>2. Provide all the information requested by Bridgnorth Plan Steering Group in its Regulation 19 submissions.</li> <li>3. Fully engage with the community.</li> <li>4. Provide informative guidance on the draft Shropshire Local Plan, with a variety of realistic examples, to enable people to make an informed response to it.</li> <li>5. Improve usability of the Consultation Forms, and extend the Regulation 18 Form to allow space for ideas, opinions, and suggestions not necessarily tied to an existing policy/site/map in the SLP.</li> <li>6. Extend the consultation response summary for the last Regulation 18 consultation to include details of changes resulting from responses received during a consultation, and improve its usability by using a larger font size.</li> <li>7. Do not take on Black Country (ABCA) housing needs. All areas, including Shropshire should look first toward utilising empty office space instead.</li> <li>8. Remove or reduce Shropshire Councils policy of uplifting central government's housing requirement by 19%.</li> <li>9. If a Garden Village is required a realistic position could be the Charlton / Overly areas to the East of Shrewsbury as there are direct and excellent road links (A5) to Shrewsbury and the M54 to Telford and beyond to the West Midlands. The railway line is very close, and a new park and ride railway station would bring easy access to Shrewsbury, Telford and the West Midlands.</li> </ol>	<p>Shropshire Council considers that a proportionate and robust evidence base has been prepared to inform the draft Shropshire Local Plan. It is acknowledged that this evidence base is substantial and contains technical material, however this is unavoidable, although where possible, non-technical summaries have been provided. During consultation Shropshire Council has provided appropriate links between relevant webpages to aid navigation. Duty to Cooperate Discussions with relevant parties have occurred throughout the Local Plan Review process and Statements of Common Ground will be informed by the content of the draft Shropshire Local Plan subject to Regulation 19 consultation.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the LHN identified for Shropshire, reasons for proposing to exceed this need and for the distribution of development proposed are documented within the explanation to draft Policy SP2. Strategic Approach. Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development. There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities. Proposals regarding accepting an element of unmet housing and employment need arising within the Black Country have been informed by proactive cross-boundary discussions, where evidence indicates housing delivery opportunities are constrained. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Shropshire Council considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Each stage of consultation has been supported by a proportionate evidence base. Following each of these stages of consultation, a summary of the responses received has been prepared and form appendices to the Consultation Statement prepared for the 'Regulation 19' Pre Submission Draft of the Shropshire Local Plan. With regard to proposed allocation BRD030 (Tasley Garden Village), this site was identified as a proposed allocation and subject to consultation within the 'Regulation 18' Plan Preparation stage of the Local Plan Review - specifically, within the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (August 2020 – September 2020).</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan. It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy. Where following consultation it has been proposed to make amendments to proposals in response to the consultation process or indeed any other emerging evidence, this has been documented within relevant subsequent consultation documents (reflecting the iterative process undertaken during the Regulation 18 Plan Preparation stage). Furthermore where such changes relate to proposed allocations (which have been the subject of the most significant level of response) this has also been documented within updated site assessments, provided as part of the evidence and consultation material for relevant stages of consultation. The consultation forms used for the last Regulation 18 and Regulation 19 consultations were based on the Planning Inspectorates 'standard' consultation form and were considered appropriate and allowed opportunities for respondents to make appropriate responses (during the Regulation 18 consultation) and representations (during the Regulation 19 consultation). A guidance note was also prepared to assist those responding to these consultations.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0661	B001 Cont'd						<p>3.No evidence is provided that Bridgnorth is an attractive location for employment provision, given the towns relatively weak connectivity. 4.No credible evidence is provided demonstrating that sustainable growth, addressing low levels of employment self-containment would result from the planned housing and employment allocations. 5.The Viability Assessment undertaken to inform the draft Shropshire Local Plan indicates Office and Industrial development are generally considered unviable on green and brownfield sites (albeit the viability calculation for "larger industrial" development on greenfield sites is marginal). Office development is likely to be less viable post Covid-19 as more staff work from home regularly for parts of the week.</p> <p>E.The last Regulation 18 consultation, the consultation on the Regulation 19 draft of the Shropshire Local Plan and the Regulation 19 draft of the Shropshire Local Plan fail to meet the test for legal compliance (including the duty to cooperate) in regard to the 'Gunning Principles' for consultation which are enshrined in law and Shropshire Councils Statement of Community Involvement (SCI) which states preparation of the Shropshire Local Plan "should be community-led and iterative between residents and itself as the LPA." Specifically: 1.The Regulation 18 and 19 drafts of the Shropshire Local Plan and associated document bundle were vast (upwards of 10,000 pages) of technically nuanced information containing thousands of links, some broken, to an untold number of further pages. Residents complained adequate guidance on navigating this material was not provided and it was not easily interpretable to allow informed responses, as required by Gunning Principles. Virtual roadshows were not undertaken to help communities better understand content and navigation of the bundle. 2.Contrary to strong advice from central government, the Regulation 18 Consultation on the Pre-Submission Draft of the Shropshire Local Plan was not presented to the community. This lack of presentation will have dissuaded many from responding. 3.Whilst a 'how to get involved' webpage was provided, there are issues with the consultation forms for the consultation on the last Regulation 18 document and the Regulation 19 draft Shropshire Local Plan. Namely: copy protection resulted in changes being discarded, difficulty completing the form dissuaded people from responding. Separate forms were required for comments on each part of policy/paragraph, controlled what people were allowed to comment on, and did not provide space for overall thoughts/opinions/ideas that do not fit into existing policies/paragraphs so people cannot comment on what is not in the draft Plan. Further as evidence documents are missing (see above) information cannot be considered available, accessible and easily interpretable for consultees as required within the Gunning Principles. 4.The promoters of BRD030 carried out a rushed and inadequate consultation on the site. Full details were not initially available, it was poorly promoted and collected unnecessary data. The manner of this consultation likely dissuaded respondents. Responses to this consultation were not reflected within the draft Shropshire Local Plan subject to Regulation 18 consultation. There is no evidence these responses were shared with Shropshire Council. May be contended that realising the inadequacy of this consultation Shropshire Council undertook a further Regulation 18 consultation, this would seem reasonable, but this was decided at Cabinet after the scope of the Regulation 19 consultation has been mis-represented, presumably to legitimise inclusion of BRD030. 6.Material concerns raised by Tasley Parish Council and Tasley residents during the last Regulation 18 consultation have not 'led to a change to the Local Plan' consulted upon at Regulation 19, with the exception of one concern touched upon but not addressed and another stipulation added that did not address the concern. As such these material concerns have either not been conscientiously considered as required by the Gunning Principles or they were deemed irrelevant. Could be contend they were conscientiously considered given the two changes made, but these do not address the concerns raised. 7.The summary of responses to the last Regulation 18 consultation does not evidence whether responses have "led to a change to the Local Plan" and if they have what change or where they could be found. Without this, how could anyone (including Shropshire Council's Cabinet) possibly be confident concerns have been conscientiously considered in the planning balance. Furthermore given this late publication (published on Friday 4th December before Cabinet on Monday 7th December) and large size of the document, how could Cabinet be confident they were full appraised, have scrutinised officer work and have conscientiously considered these responses and be confident they were appropriately responded to, prior to the decision to approve the Regulation 19 Consultation. Furthermore, at Cabinet there was inconsistency in how many questions were allowed to individuals/organisations and the reading of preamble which impacted on understanding of observers and Cabinet. This has led to many feeling the decision was just a tick box/rubber stamping exercise regardless of community views. 8.Gunning Principles mean for a consultation to be considered legal, it is not just about conducting a consultation. Shropshire Council's approach has actually prevented effective consultation and informed decision making. F.The community-led Bridgnorth Plan and community views have been ignored.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0661	B001 Cont'd			

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0661	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	No	<p>Concerned about how Shropshire Council changed their position regarding preferred allocations for Bridgnorth (from Stanmore Garden Village to BRD030).</p> <p>-Have deep concerns regarding scale of the proposed allocation Tasley Garden Village (BRD030). New housing developments in the Bridgnorth area need to be of a volume compatible with and sensitive to the historic town and both current and future residents. BRD030 is simply too big to be absorbed into a historic town the size of Bridgnorth, it is wholly inappropriate for the area and the environment, its location is problematic (wrong side of the A458 Bridgnorth bypass), uses proposed on BRD030 conflict with the proposed Industrial Poultry Unit (which the majority of residents oppose), there is a substantive lack of credible evidence justifying BRD030 'preferred site' status, and key assessments including assessments of 'reasonable alternatives' such as those proposed in the community-led Bridgnorth Plan are missing.</p> <p>-Consider preference for a single Garden Village, in keeping with the high growth strategy, is inappropriate and unsustainable for Bridgnorth and a split site approach would achieve sustainable growth with less environmental impact. Question whether only a garden village can deliver necessary infrastructure and amenities, policies could require funding to upgrade required amenities in central locations, retaining the integrity of Bridgnorth's town centre. Impact on infrastructure will always be significant but would be reduced if the approach in the community-led 2020 Bridgnorth Plan was applied - National Government wants decisions at the lowest level possible and has introduced the Neighbourhood Plans which, once in force, should inform decisions (Shropshire Council has embraced other Community Led Plans as material considerations).</p> <p>-Highway infrastructure in and around Bridgnorth is already showing signs of capacity constraints before existing/proposed allocations. It will need substantial improvements to accommodate traffic from these developments, but no Highways Assessment has been carried out.</p> <p>-Other infrastructure and amenities (such as schools, medical centre, shops, leisure areas and social housing) should be provided as needed not 9 years into the development as proposed by the promoters of BRD030.</p> <p>-Housing development should be initiated by need, not cash generation. Development needs to be viable but policies needs to ensure it is sustainable, sensitive to the local environment and ecology, and provides necessary infrastructure.</p> <p>-16ha of employment land is proposed on BRD030 (and a further 6.3ha on the current SAMDev Plan allocation), but there are only a few major employers (&gt;100 employees) in the town and no major employers have relocated to the town in the last 20 years, due to transport links compared with other nearby settlements likes Wolverhampton, Telford and Shrewsbury. Also unclear how many jobs will be provided on this site or how many economically active will live on the wider site.</p> <p>-No local housing need assessment or detailed infrastructure plan been carried out.</p> <p>-BRD030 agricultural land classification is based on the general agricultural land classification map, but consider likely graded at least 3a. A detailed agricultural land assessment should be undertaken for the site, which would likely demonstrate its high quality meaning it should be reserved for arable agricultural use on the grounds of sustainability and food security.</p> <p>-The SAMDev Plan proposed the relocation of the livestock market due to conflict with housing. BRD030 would result in housing in proximity of the site for the relocation of the livestock market.</p> <p>-BRD030 encompasses the site for a proposed Industrial Poultry Unit planning application (ref: 17/01033/EIA, which was previous granted and the decision quashed at the court of appeal), this will expel obnoxious odours and toxic dust containing hazardous PM2.5 and PM10 particulates untreated into the atmosphere. Prevailing winds will disperse this pollution for kilometres over Bridgnorth Town and surrounding communities. No one would want to live near this facility, as such BRD030 is unviable.</p>
A0662	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	Not Specified	Yes	Not Specified	<p>Telford &amp; Wrekin Council support the aims and direction of the gateway 'Shropshire Test' Policy SP1 which sets out several priorities that new development should address. This includes supporting cohesive communities, mitigating the impacts of climate change and promoting green and blue infrastructure networks among other issues. In this regard Policy SP1 contributes to a positively prepared Local Plan. The provision of sufficient infrastructure from development proposals is also referenced in the Shropshire Test and this is of particular interest to Telford &amp; Wrekin Council, under the Duty to Cooperate. Development proposals in locations within close proximity to Telford &amp; Wrekin Council need to be considered on a cross-boundary basis given the infrastructure implications. Reference is made below to site allocations and the cross-boundary implications of those proposals.</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0661	B002	<p>1. Adopt the community-led Bridgnorth Plan into the draft Shropshire Local Plan in lieu of unilaterally imposing a Garden Village model in the Bridgnorth area.</p> <p>2. Provide all the information requested by Bridgnorth Plan Steering Group in its Regulation 19 submissions.</p> <p>3. Fully engage with the community.</p> <p>4. Provide informative guidance on the draft Shropshire Local Plan, with a variety of realistic examples, to enable people to make an informed response to it.</p> <p>5. Improve usability of the Consultation Forms, and extend the Regulation 18 Form to allow space for ideas, opinions, and suggestions not necessarily tied to an existing policy/site/map in the SLP.</p> <p>6. Extend the consultation response summary for the last Regulation 18 consultation to include details of changes resulting from responses received during a consultation, and improve its usability by using a larger font size.</p> <p>7. Do not take on Black Country (ABCA) housing needs. All areas, including Shropshire should look first toward utilising empty office space instead.</p> <p>8. Remove or reduce Shropshire Councils policy of uplifting central government's housing requirement by 19%.</p> <p>9. If a Garden Village is required a realistic position could be the Charlton / Overly areas to the East of Shrewsbury as there are direct and excellent road links (A5) to Shrewsbury and the M54 to Telford and beyond to the West Midlands. The railway line is very close, and a new park and ride railway station would bring easy access to Shrewsbury, Telford and the West Midlands.</p>	<p>Shropshire Council has undertaken a Local Housing Need (LHN) assessment for Shropshire. Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>Shropshire Council considers the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). In identifying this proposed development strategy consideration of the characteristics, constraints and opportunities associated with Bridgnorth and its surrounding area has been undertaken.</p> <p>Proposed site allocations have been informed by a comprehensive site assessment process, which included consideration of all promoted sites. This assessment considered factors such as highways, ecology, heritage, agricultural land quality, flood risk and water quality and public protection.</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 states development can only occur where there is sufficient existing infrastructure capacity available or where the development would lead to a shortfall in infrastructure provision, the development funds necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. Furthermore, several draft site guidelines proposed for BRD030 relate to infrastructure provision (including highway infrastructure). A draft site guideline proposed for proposal allocation BRD030 also relates to the potential intensive poultry units currently subject to a Planning Application within the extent of the BRD030 site promotion.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans.</p> <p>Please also refer to the response to A0661-B001.</p>	No
A0662	B001	n/a	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0662	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S20, DP25	Not Specified	Not Specified	Not Specified	Our previous response highlighted issues arising from the proposal including transport infrastructure in and around Ironbridge and the wider Telford area including the M54, the impact of development on the setting of the World Heritage Site (including buffering and screening of the site from Ironbridge), health and education provision and seeking clarification on Shropshire Council's aspirations for redevelopment of the site.
A0662	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15.1 Shifnal	Not Specified	Not Specified	Not Specified	Given the scale of development proposed and the additional safeguarding of approximately 93 ha of land around Shifnal for future development, evidence should be provided to demonstrate, through discussions with Highways England, that the strategic transport impacts on Junctions 3 and 4 of the M54 have been considered and appropriately addressed. There should be a mechanism to capture the impacts of growth around Shifnal for future improvements to these junctions. If the evidence concludes there is no spare capacity to meet the impact of the proposed development, clarification should be provided in the Local Plan or infrastructure planning evidence that contributions would be collected towards strategic highways infrastructure works. The strategic implications of the Shropshire Council Water Cycle Study (July 2020) for Telford & Wrekin Council are unclear. Clarification should therefore be provided through the relevant Local Plan policies (Policy S15 Shifnal Place Plan Area and Policy DP25 Infrastructure Provision) and supported by evidence of engagement with the Environment Agency and Severn Trent Water. The Council are also interested in understand in the impact of development proposed within the plan on secondary school provision.
A0662	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S19	Not Specified	Not Specified	Not Specified	The Council previously commented on the proposed site allocation and recognises the benefits of regenerating a large previously developed site. The approach in Policy S19 requires a comprehensive masterplan to be adopted by Shropshire Council, it is assumed prior to the submission of an application for planning permission.
A0662	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP25	Not Specified	Not Specified	Not Specified	Given the scale of development proposed at the former Ironbridge Power Station and around Shifnal, the Shropshire Local Plan should appropriately acknowledge the cross boundary implications for Telford & Wrekin Council, including impacts on the Princess Royal Hospital in Telford which is the nearest accident and emergency hospital to both locations. The Shropshire Strategic Infrastructure Implementation Plan (December 2020) refers to GP and primary care provision in Shrewsbury but does not consider the impacts on the Princess Royal Hospital of development adjacent to or east of Telford.
A0663	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Introduction	Not Specified	Not Specified	Not Specified	We are pleased to see that a reference to affordable housing has been incorporated into the Local Plan Spatial Vision on page 11. It is important that affordable housing is given sufficient weight and status within the Plan so that those whose needs are not met by the current market are still provided for through the provision of a wide choice of high quality affordable homes.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0662	B002	S20 in the pre-submission draft plan makes no reference to Telford or to the site's location relative to Telford. The fact that it is a cross-boundary application, as both Shropshire Council and Telford & Wrekin Council are dealing with the planning applications, should be acknowledged in the policy wording or supporting text. This should include reference to the significant infrastructure impacts that will need to be addressed through developer contributions. This includes the estimated £6m package of developer contributions identified as required to mitigate the infrastructure impacts within Telford & Wrekin alone. The need to reflect this position in Policy S20 is further reinforced by Policy DP25 which requires new development, which would lead to a shortfall in infrastructure provision, to fund necessary improvements through a suitable developer contribution (unless addressed by other means). This is an immediate pressure arising from the development proposal which could not have been factored into preparation of the existing Telford & Wrekin Local Plan because the power station proposals were not clear at the time of Local Plan preparation and examination. The impact of the development on secondary school capacity in Telford is a cross boundary issue and should be appropriately mitigated through the planning process. Policy DP25 is clear that development proposals should address any shortfalls in infrastructure provision. Consequently, there should be a clear reference in Policy S20 that infrastructure shortfalls arising from development of the former Ironbridge Power Station could be addressed by Shropshire Council. The link between Policies DP25 and S20 should be strengthened.	Noted. Proposed site guidelines for the proposed Former Ironbridge Power Station Strategic Settlement include a requirement to undertaken "any necessary improvements to the local and strategic road network...", informed by an appropriate Transport Assessment at the Planning Application stage (site is currently subject to a Planning Application and it is understood a Transport Assessment has been undertaken in support of this application). The draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 addresses infrastructure provision and applies to all development proposals, including on proposed site allocations. However, for clarity a minor modification is proposed to the explanation of draft Policy DP25 regarding cross-boundary CIL spend.	No
A0662	B003	Given the scale of development proposed and the additional safeguarding of approximately 93 ha of land around Shifnal for future development, evidence should be provided to demonstrate, through discussions with Highways England, that the strategic transport impacts on Junctions 3 and 4 of the M54 have been considered and appropriately addressed. There should be a mechanism to capture the impacts of growth around Shifnal for future improvements to these junctions. If the evidence concludes there is no spare capacity to meet the impact of the proposed development, clarification should be provided in the Local Plan or infrastructure planning evidence that contributions would be collected towards strategic highways infrastructure works. The strategic implications of the Shropshire Council Water Cycle Study (July 2020) for Telford & Wrekin Council are unclear. Clarification should therefore be provided through the relevant Local Plan policies (Policy S15 Shifnal Place Plan Area and Policy DP25 Infrastructure Provision) and supported by evidence of engagement with the Environment Agency and Severn Trent Water.	These matters are addressed through Statements of Common Ground with these other authorities.	No
A0662	B004	Policy S19 should reference Policy DP25 and recognise the cross boundary infrastructure implications, notably the highways impact along the A41 towards Newport and also Junction 3 of the M54. Clarification is still required on the long term use of the adjacent airfield at RAF Ternhill given that further development in this location beyond that set out in Policy S19 could have significant cross-boundary infrastructure impacts.	Noted. The draft Shropshire Local Plan should be read as a whole. Draft Policy DP25 applies to all development proposals including those upon proposed site allocations. For clarity a minor modification is proposed to the explanation of draft Policy DP25 regarding cross-boundary CIL spend. The proposed Strategic Settlement at Clive Barracks, Tern Hill does not extend onto the adjacent airfield, which it is understood is intending to remain an active RAF airfield.	No
A0662	B005	Clarification of discussions with the Clinical Commissioning Group should be provided to ensure that the development impacts have been considered for this important cross-boundary service; any identified impacts should be acknowledged in the respective Local Plan policies.	Shropshire Council has engaged with strategic infrastructure providers, including the Clinical Commissioning Group, through the Place Plan process (the Place Plans have informed the Strategic Infrastructure Implementation Plan and together these documents form part of the evidence base for the draft Shropshire Local Plan). Draft Policy DP25 specifies that new development should only take place where there is sufficient existing infrastructure capacity available. Where a new development would lead to a shortfall in infrastructure provision, the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means. This of course applies to cross-boundary infrastructure. However, for clarity a minor modification is proposed to the explanation of draft Policy DP25 regarding cross-boundary CIL spend where this is justified.	Yes
A0663	B001	N/A	Noted. Shropshire Council recognises the importance of providing affordable housing. It is for this reason that a series of draft Policies are proposed which introduce a series of mechanisms for the delivery of affordable housing.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0663	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	A fundamental requirement of the NPPF is the responsibility placed upon Local Planning Authorities to “boost significantly” the supply of market and affordable housing. It is therefore critical for the Local Plan to ambitiously plan to meet affordable housing need across the District. Failure to do so will inevitably cause further deterioration in the delivery of affordable housing, placing many more families on ever-increasing housing waiting lists; an issue which is already a serious one in Shropshire as documented at supporting paragraph 3.15. Given an estimated affordable housing need of 799 households per year, it is clear that the delivery of 7,700 affordable units over the lifetime of the emerging 18 year plan period will not be enough to support all of those who are in housing need.
A0663	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	Not Specified	Not Specified	We are pleased to see part six of policy SP11 allows for the delivery of affordable housing on rural exception sites within the Green Belt, where there is a proven need, in line with national policy.
A0663	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	Not Specified	Not Specified	Support introduction of the Nationally Described Space Standard (NDSS) where there is a proven need for such a technical standard. However, we ask the Council to strongly consider applying this standard across all tenures to ensure Registered Providers are competing on an equal basis for land purchases. Currently, introduction of draft Policy DP1, implementing the Nationally Described Space Standards, does not meet the tests set out in the Planning Practice Guidance (Paragraph: 002 Reference ID: 56-002-20160519) and as originally set out in a Written Ministerial Statement (WMS, 2015), each of which set out a requirement to address a clearly evidenced need. The Council has not published any evidence which shows the need for adopting the standards, and nor is this demonstrated in the Submission Draft. As a result, the introduction of NDSS is not consistent with national planning guidance.
A0663	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	Not Specified	Not Specified	Concerned that the affordable housing thresholds listed in points 1(a) of policy DP3 for the northern and southern regions are exceptionally low. There are in excess of 5,000 households on the Councils Choice based housing register who are looking for homes and the Shropshire SHMA (2020) concluded that an estimated 799 households per year will require affordable housing over the plan period. In addition, linking the proposed 10% and 20% affordable housing thresholds to sub-section 3 of policy SP2, it is unlikely that the Council will achieve an overall housing delivery of 25% of the total housing requirement stated in the local plan’s strategic vision. Section 1(e) is acceptable as long as the guidance within the MHCLG policy statement on Rents for Social Housing is applied, which permits annual rent increases on both social rent and affordable rent properties of up to CPI+1% point from 1 April 2020. Rental caps would give the effect of a rent cut for RPs. The significant concern is that this scenario would be highly unsustainable and uncompetitive for Housing Associations and could potentially severely threaten delivery of affordable housing across Shropshire. Sub-section 1(h) of policy DP3, encouraging pepper potting across a scheme makes management more difficult as the properties are more spread out. Securing affordable housing in perpetuity more widely is not supported for a number of reasons, foremost of which is that it restricts lenders appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. Therefore suggest the Council remove any references to retaining affordable housing in perpetuity unless explicitly referring to rural exception sites.
A0663	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP4	Not Specified	Not Specified	Not Specified	Support the Council’s decision to include Policy DP4, enabling the development of affordable housing on various types of exception sites. Exception sites can be an effective way of creating a steady stream of affordable built homes in areas of need.
A0663	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP5	Not Specified	Not Specified	Not Specified	Pleased the Council has included this form of policy approach in the emerging plan following its introduction in the revised NPPF. Our members support the opportunity to meet local housing needs including first time buyers or those looking to rent their own home.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0663	B002	It is critical that the Council are pro-active in their efforts to secure the maximum provision of affordable housing in Shropshire in order to meet the needs of its residents. This means that local plan should seek to drive change across the Authority through a pragmatic and ambitious approach to affordable housing, encouraging greater diversity to meet all needs where possible. Maximising the delivery of affordable housing is a priority of the plan and introducing policies that restrict the delivery of affordable housing should be avoided where possible.	Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. The draft Shropshire Local Plan should be read as a whole. Shropshire Council considers that the draft Shropshire Local Plan introduces an appropriate 'toolbox' of measures to positively contribute towards the delivery of appropriately located and appropriate types and sizes of affordable housing to meet identified local needs.	No
A0663	B003	n/a	Noted	No
A0663	B004	Concerned that applying the NDSS could potentially result in fewer affordable homes being delivered across Shropshire as optional technical standards have implications for build costs and sales values, with implications in turn for development viability. It is possible that many eligible households in Shropshire may not desire, or require housing that meets the NDSS, as it may result in for example, higher rental and heating costs. Not as to hinder the delivery of much needed affordable housing, we recommend that the requirement for all affordable dwellings to achieve NDSS is removed unless it can be demonstrated that there is a clear need for such a standard in all residential properties in Shropshire.	Noted. The approach to nationally described space standards proposed within Para 3 of draft Policy DP1 is considered to positively respond to the evidence available within the Strategic Housing Market Assessment (SHMA) and other sources. Providing dwellings with sufficient internal floorspace positively contributes to the future occupier's ability to achieve a high-quality of life and is responsive to changing household requirements, by increasing the ability to include adaptations at a later date.	No
A0663	B005	Given the level of need, strongly encourage the Council to review the thresholds and set ambitious targets for affordable housing as a mechanism to significantly increase delivery and improve affordability across the Authority. The scale of need means the Council is justified in seeking to secure as much affordable housing as viability allows. Nonetheless, such thresholds must be realistic and viable for most development scenarios, so must therefore undergo rigorous testing. The requirement for the staircasing to be capped at 80% is not warranted or justified and should be removed. Recommend affordable housing is clustered across larger sites, with policy expressing a maximum group size or range; 10 to 15 dwellings forming each cluster on larger sites is commonly favoured. Clustering can be achieved while delivering visually indistinguishable housing products that are well dispersed throughout developments. First Homes are required to be retained as such in perpetuity. Stress the difference between First Homes and other forms of affordable housing principally social and affordable rent and shared ownership and how the requirement for First Homes to be maintain in perpetuity is appropriate and set out in the Government's draft regulations.	Noted. Shropshire Council considers that the proposed affordable housing contributions are appropriate. They respond to the significant affordable housing need identified in Shropshire and best available information on development viability within the Whole Plan Viability Study, undertaken to inform the draft Shropshire Local Plan. Requirements for affordability in perpetuity and limitations on staircasing reflect that significant need and established approaches, securing a range of affordable housing which is meeting continuing need beyond that of initial occupants. It is considered appropriate to require affordable housing to be appropriately pepper-potted through a site. Inclusion of specific policies in the Draft Shropshire Local Plan setting out requirements for a range of affordable delivery options provides greater clarity for the development industry to bring appropriate schemes forward. A Housing Supplementary Planning Document (SPD) will support housing policies and will be used appropriately to provide further guidance and detail regarding matters such as use of legal agreements, affordability in perpetuity, staircasing and affordable housing distribution and set out how mechanisms may reflect individual site circumstances, where this is required	No
A0663	B006	1(e) Affordable housing should only be retained in perpetuity on rural exception sites as referenced in the glossary to the NPPF. Any references to retaining affordable housing in perpetuity unless explicitly referring to rural exception sites should be removed from the pre-submission draft.	Requirements for affordability in perpetuity reflect significant need for affordable housing and established approaches, securing a range of affordable housing which is meeting continuing need beyond that of initial occupants. Inclusion of specific policies in the Draft Shropshire Local Plan setting out requirements for a range of affordable delivery options provides greater clarity for the development industry to bring appropriate schemes forward.	No
A0663	B007	Concerned by the statement that the 'All the dwellings will be retained as affordable in perpetuity'. Paragraph 71 of the NPPF makes no reference to affordable housing being retained in perpetuity on entry level exception sites. Nor is it included in the Glossary in Annex 2. Government policy only requires affordable housing be secured in perpetuity on rural exception sites. Entry level exception sites are distinctly different to rural exception sites as they are aimed at first time buyers or young households wishing to rent their first property.	Requirements for affordability in perpetuity reflect significant need for affordable housing and established approaches, securing a range of affordable housing which is meeting continuing need beyond that of initial occupants. Inclusion of specific policies in the Draft Shropshire Local Plan setting out requirements for a range of affordable delivery options provides greater clarity for the development industry to bring appropriate schemes forward. A Housing Supplementary Planning Document will support housing policies and will be used appropriately to provide further guidance and detail regarding matters such as use of legal agreements, affordability in perpetuity staircasing and affordable housing distribution and set how out mechanisms may reflect individual site circumstances, where this is required.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0663	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP7	Not Specified	Not Specified	Not Specified	The West Midlands HAPC strongly supports the allowance of some market housing under this preferred option to support the delivery of affordable housing in locations where it may not be possible otherwise.
A0663	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	Not Specified	Not Specified	While we are pleased to see that Shropshire has a strong agenda in promoting renewable energy and its use in development in line with paragraph 51 of the NPPF, there are concerns regarding the costs for housing associations to implement such an increase in renewable energy generation across their sites. We appreciate that more efficient technologies have become available in recent years, nonetheless robust viability testing should be carried out to ensure that applicants continue to be able to deliver affordable housing schemes with such an increase.
A0663	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP12	Not Specified	Not Specified	Not Specified	The requirement for 10% biodiversity net gain is expected to be a mandatory requirement when the Environment Bill is enacted.
A0664	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1 & DP3	No	No	No	Policy DP3 has not been fully considered in how it will apply to specialist housing proposals. There is no recognition of the unique characteristics of specialist housing for older people. In general retirement living and extra care proposals are not capable of accommodating affordable housing on site. Far from convinced that the necessary viability testing has been undertaken within the Viability Assessment (undertaken to inform the draft Shropshire Local Plan), to demonstrate that specialist housing for older people can provide for the equivalent policy requirement sought for affordable housing. The viability testing does not provide a robust position whereby site-specific negotiations can refer back to the viability supporting the local plan in line with requirements of the NPPG. From our review of the Local Plan viability evidence base it is not obvious that any of specific viability assumptions agreed as part of the review of the Churchill sites in Bridgnorth have been factored into the plan wide study. The plan fails to test reasonable standardised, industry acceptable inputs to viability.
A0664	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	No	No	No	If Government implements proposed changes to Part M of the Building Regulations as set out in the "Raising Accessibility Standards for New Homes" consultation, which closed on 1 December 2020, Bullet Points 4 & 5 of Policy DP1 will be unnecessary. In the meantime, if the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46) and the NPPG. The Retirement Housing Consortium would ask it to be noted that: a) Whilst not all its apartments are necessarily built to wheelchair adaptability standards, they will incorporate a very high degree of accessibility and features not least (a) level and step free access throughout (b) wheelchair and mobility scooter storage meaning that it is no then necessary to have storage facilities in each apartment - thereby addressing aspects of M4(3) compliance, albeit indirectly. Such schemes therefore do much to address need without full compliance. b) Any proposal for an additional requirement, particularly for specialised housing for older people must be very carefully assessed in viability terms. Whilst the exact impact remains to be seen, coronavirus is likely to give a considerable shock to the viability of such housing and also, particularly incorporating M4(3) requirements in such schemes is likely to be additionally costly given not only the actual costs of doing so but also this will impact on the density and efficiency of a development which is usually made up of small units (as desired by older people moving to housing more suited to their needs) in a single building
A0664	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	No	No	No	We support the views of the HBF that a different policy approach should be taken to ensure that much needed specialist accommodation for older people is delivered. Policy DP1 part 4 (as detailed elsewhere in this submission) considers almost exclusively the requirement for wheelchair/accessible adaptable housing. This may be taken to infer that the needs for older persons accommodation can be addressed entirely by the delivery of such housing. Such housing does not deliver on the many benefits that specialised housing for older people can bring, not least addressing loneliness and providing support. We consider that the best approach towards meeting the diverse housing needs of older people is one that encourages both the delivery of specialist forms of accommodation such as sheltered / retirement housing and Extra Care accommodation.
A0665	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	6.6a	Yes	Yes	Yes	The Trust broadly considers this policy to be legally compliant and sound in terms of seeking to protect valued facilities from loss in line with paragraph 92 of the NPPF (2019). However, we consider its effectiveness and robustness would be improved with the addition of criteria either within the policy or supporting text which outlines how applicants would be expected to justify loss.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0663	B008	n/a	Noted	No
A0663	B009	Such a policy should ensure that while schemes are future proofed this should not prejudice the delivery of affordable housing which remains one of the most critical priorities for the Council, understanding the level of need identified in the SHMA and the housing register.	A Whole Plan Viability Assessment has been undertaken to inform policy requirements with the intention of ensuring the viability and deliverability of the draft Shropshire Local Plan. Draft Policy DP11 has been subject to due consideration within this assessment. No change proposed.	No
A0663	B010	If the Council is looking to mandate biodiversity net gain through the Local Plan, guidance must be provided (or signposted) on how to practically achieve net gain in development. This would allow for net gain to be designed into processes at early stages and for any design issues to be detected and resolved without causing delay to development.	This is set out in the Environment Bill and as such, is outside the remit of the Local Plan. No change proposed.	No
A0664	B001	DP3 should be amended to include reference to specialist housing for older people, acknowledging that in most cases it is recognised that affordable housing cannot be accommodated on the development site. In most cases it should be recognised that an off site payment in lieu should be agreed where viable. The council should amend the policy to explicitly set out that viability of specialist housing for older people is generally restricted and that the local authority will apply flexibility on a site by site basis as required to ensure that such housing comes forward to meet a clearly established housing need locally.	The draft Shropshire Local Plan is intended to be read as a whole. Draft Policy DP1 and its supporting text specifically references housing for older people and those with disabilities or special needs. Shropshire Council considers that the proposed affordable housing contributions are appropriate. They respond to the significant affordable housing need identified in Shropshire and best available information on development viability, from within the Shropshire Viability Study. Draft Policy DP3 does make provision for consideration of reduced rates of affordable housing due to viability concerns in exceptional circumstances where clear evidence is presented and agreed. A Housing Supplementary Planning Document will support housing policies and will be used appropriately to provide further guidance and detail	No
A0664	B002	Detailed information on the accessibility and adaptability of the existing housing stock, the size, location, type and quality of dwellings needed and variations in needs across different housing tenures in the County should be incorporated into the Council's supporting evidence.	Noted. Shropshire Council considers that the Strategic Housing Market Assessment (SHMA) (2020) is a robust and proportionate evidence base for informing policies on housing need. Shropshire Council also consider that its proposed requirements in relation to M4(2) and M4(3) housing are appropriate, justified and consistent with national guidance and policy. It is considered appropriate to require all dwellings specifically designed for the elderly or those with disabilities to meet M4(3) (wheelchair user dwellings) standard within Building Regulations. If site-specific factors indicate that step-free access cannot be achieved, it is questionable as to whether the site or element of the site should be identified for dwellings specifically to meet the needs of the elderly or those with disabilities.	No
A0664	B003	Well located and designed specialist housing for older homeowners is a highly sustainable form of housing. Given the critical need for older persons accommodation in the West of England there should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites. It is recommended that greater weight is attached to this approach alongside the desire to release residential land within strategic allocations or indeed a separate policy within the document to cover the housing need for the ageing population. This accommodation will come from a number of sources both public and private and with varying levels of care and shelter provision enabling individual people to remain in their own home with independence and security. In effect there should be more of a positive policy supporting older people's accommodation in the same way that affordable housing is given a high priority.	It is considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically: -Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings. -Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people. -Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation.	No
A0665	B001	We recommend that such evidence should include evidence of marketing over a period of 12-24 months through recognised local, regional and national agents and channels appropriate to the type of facility being marketed, at a price consistent with the facility's existing use and condition without development potential. It should also be demonstrated that there is no longer a need for the facility.	The Council considers that paragraph 3.46 covers this issue. No change proposed.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0666	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S8.1 Ellesmere Inset Maps	Not Specified	Not Specified	Not Specified	Ref Appendix 1 Ellesmere Place Plan Area Site Assessment Dec 2020 I would like to bring to your attention that on page 16, row 5 "Amenity Space", DHG011 plot boundary is within 480 metres (distance being about 400 metres to the centre of the village). Also ref same site under "Highway Comments", page 137, the existing drive entrance, which is contained in the site, is not on double white lines or on a bend. There is a short area of existing kerbing in front of Pentre Heylin Cottage and there is sufficient space both sides of cottage for a new path which would link to existing paths to the North and South.
A0667	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Not Specified	No	Not Specified	Clive should not be identified as a Community Hub as two services/facilities identified within the Hierarchy of Settlements Assessment are no longer presented. Specifically the bowling green is located within a private garden (and has been for 2 years) and the village shop has now closed (October 2020) and the owner has confirmed it will not be re-opening. Taking these out would lower its score to 47, meaning Clive would no longer exceed the threshold for Community hub status. The post office operates only 2-4 hours a week and as such does not warrant significant points for this service.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0666	B001	<p>Ref Appendix 1 Ellesmere Place Plan Area Site Assessment Dec 2020</p> <p>I would like to bring to your attention that on page 16, row 5 "Amenity Space", DHG011 plot boundary is within 480 metres (distance being about 400 metres to the centre of the village). Also ref same site under "Highway Comments", page 137, the existing drive entrance, which is contained in the site, is not on double white lines or on a bend. There is a short area of existing kerbing in front of Pentre Heylin Cottage and there is sufficient space both sides of cottage for a new path which would link to existing paths to the North and South.</p>	<p>Noted. Shropshire Council considers that the Sustainability Appraisal of the draft Shropshire Local Plan and site assessment process which informs proposed allocations is proportionate and robust.</p>	No
A0667	B001	<p>Update the Hierarchy of Settlements Assessment to remove the points attributed to Clive for the bowling green and village shop. This results in the settlements score dropping below Community Hub status. Remove Community Hub status from the settlement within the draft Shropshire Local Plan.</p>	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub.</p> <p>Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0668	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 Clive	Not Specified	No	Not Specified	Clive should not be identified as a Community Hub as two services/facilities identified within the Hierarchy of Settlements Assessment are no longer presented. Specifically the bowling green is located within a private garden (and has been for 2 years) and the village shop has now closed (October 2020) and the owner has confirmed it will not be re-opening. Taking these out would lower its score to 47, meaning Clive would no longer exceed the threshold for Community hub status. The post office operates only 2-4 hours a week and as such does not warrant significant points for this service.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0668	B001	Update the Hierarchy of Settlements Assessment to remove the points attributed to Clive for the bowling green and village shop. This results in the settlements score dropping below Community Hub status. Remove Community Hub status from the settlement within the draft Shropshire Local Plan.	<p>Noted. Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire, including in relation to Clive.</p> <p>With regard to the bowling green in Clive, the concerns raised are noted, however it remains a designated open space and is included within the Council's published Open Space Needs Assessment undertaken to inform the draft Shropshire Local Plan. Any proposal to use this open space for an alternative purpose would need to be considered against both Local and National policy. Paragraph 97 of the National Planning Policy Framework (NPPF) states "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use." As such it is considered appropriate and accurate to retain this facility within the Hierarchy of Settlements Assessment. It is also noted that the Hierarchy of Settlements Assessment does not include Renshaw Field, which is of course an Outdoor Sports Facility in Clive which was recently purchased by Renshaw Field Association. This purchase was part funded by Community Infrastructure Levy (CIL) generated as a result of residential development. Any future update of the Hierarchy of Settlements would need to reflect the presence of this facility.</p> <p>With regard to the convenience store, it is understood that the shop closed in October 2020 and the owner is no longer seeking to re-let it. As this closure occurred during the Covid-19 pandemic it was considered important to establish why the facility had closed and whether this was a permanent closure. It is now understood that the closure is intended to be permanent and a Planning Application to convert the shop to a residential annexe (21/00048/FUL) has been granted. Whilst generally the loss of community facilities is something resisted by local communities and local Town and Parish Councils, it is understood in this instance the Parish Council supported this Planning Application to re-use this building, and therefore accept the loss of any future opportunity to use the premises for a local convenience store. Given this Planning Permission, this would of course need to be acknowledged in any future update of the Hierarchy of Settlements Assessment. However, importantly, even if the shop in Clive is removed from the Hierarchy of Settlements Assessment, it is considered that Clive would still exceed the Community Hub threshold. As such it is considered appropriate for Clive to be identified as a proposed Community Hub. Shropshire Council also recognises the diverse nature of Community Hub settlements across Shropshire. As such the proposed development strategy and development guidelines for each settlement has been informed by consideration of each settlements characteristics, constraints and opportunities.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0669	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP25	Not Specified	No	Not Specified	<p>Support much of draft Policy DP25. It is consistent with regulations and national policy that where a new development would lead to a shortfall in infrastructure provision, the development will be required to fund necessary improvements through a suitable developer contribution (unless the identified shortfall is being addressed by other means). Given the many competing infrastructure needs arising from development, also agree with the proposed approach of prioritising using developer funds to support critical or statutory infrastructure requirements first. However, the policy states that details of the infrastructure requirements are set out in supporting documents. Documents referenced in para 3 of draft Policy DP25 (Shropshire Place Plans and Local Infrastructure Plan) and draft guidelines for proposed site allocations fail to identify the need for any specific critical NHS Trusts healthcare infrastructure, despite para 4.226 of the proposed explanation to draft Policy DP25 including specific reference to additional health facilities (also note the Annual Infrastructure Funding statement also makes specific reference to medical facilities). Consider this omission makes the draft Shropshire Local Plan unsound.</p> <p>Also consider it is important for the draft policy to make reference to details of infrastructure requirements also being identified in the site allocation policies S1 to S20 and in any associated forthcoming masterplan documents.</p> <p>The National Planning Policy Framework (NPPF) and associated National Planning Practice Guidance (NPPG) require viability of development to be robustly tested, therefore vital for significant additional critical NHS Trusts' healthcare infrastructure requirements to be specifically identified within the current the plan-making process. Disappointed no proactive engagement occurred with the NHS Trusts regarding the Viability Assessment undertaken to inform the draft Shropshire Local Plan - without inclusion of all known critical healthcare infrastructure in viability modelling, there is a risk the draft Shropshire Local Plan may not be deliverable (understand there is little headroom within development).</p> <p>The 'Planning for Patients: The Role of Section 106 Planning Contributions' report recognises CIL/S106 are sources of funding for healthcare estate. Also note Council Officers attended One Public Health (OPH) NHS Trusts' estates meetings to coordinate bids for central funds for development and discussed potential use of CIL/S106, but no request for healthcare infrastructure requirements or funding shortfalls was made.</p> <p>Proposals in the draft Shropshire Local Plan would result in around a 22.36% population increase over the proposed Plan period. To maintain current levels of healthcare service provision, NHS Trusts would need to build new, extend and/or replace healthcare facilities to provide greater capacity than currently required to serve the existing population numbers. As such, seeking a contribution of approximately 10% of the overall cost, equating to around £3,750,000 +VAT (excluding revenue costs not yet calculated and would not costs (need for indexation)/needs may change over time). Approximate cost estimates are:</p> <p>-Replacement of 71, Salop Road – Oswestry (community mental health services) £1.5M +VAT; -Replacement of 25, Corve Street – Ludlow (mental health clinic) £1.5M +VAT; -Development at Redwoods Centre – Shrewsbury (residential care for adults with acute mental health problems, dementia, rehabilitation needs, and as a low secure forensic unit) £2.5M +VAT -Development of Bishops Castle Community Hospital which has extensive lifecycle issues. £5M +VAT; -Ludlow Community Hospital – known to be past it's life span - replacement £17M +VAT; -Bridgnorth Community Hospital – development works - £3M +VAT; -Whitchurch Community Hospital – development works and upgrades £5M +VAT; -Dental surgeries – compliance and development £2M +VAT</p> <p>Existing alternative funding streams do not take account of the proposed scale of growth in population projected in the Draft SLP and therefore, without the necessary contribution from developers either through CIL and/or S106 agreements, it would be impossible for the level of service required to be provided and maintained.</p> <p>Consider these requirements meet the CIL/S106 eligibility tests (documented in representation).</p> <p>Fully support draft Policy SP6, however to achieve its objectives, it is vital that the council have a full understanding of the healthcare facilities required to serve an expanded population.</p>
A0670	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17.2 HDL006	Yes	Yes	Yes	<p>Fully support Hadnall Parish Councils endorsement of HDL006 as the preferred site and adoption of Hadnall as a Community Hub.</p> <p>Would also like to see HDL0013 &amp; HDL016 included within the development boundary.</p>
A0671	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1	Not Specified	Not Specified	Not Specified	<p>United Utilities (UU) do not object to proposed allocations at Market Drayton, however note that current water infrastructure (particularly sewers) may have limited capacity to support planned growth and require upgrading. A coordinated/collaborative approach with UU will ensure assets required to support planned growth are provided without any unexpected delays to future allocations.</p> <p>Welcome approach proposed in draft Policy DP22 and site specific policies in Market Drayton regarding sustainable drainage. Keen to ensure surface water from new developments is designed holistically as part of any proposed landscaping/green infrastructure and subsequently discharged in accordance with the surface water hierarchy.</p> <p>Further reference to draft Policy DP22 (and other relevant draft Policies) in S11 would further strengthen the requirements and ensure the consistency as allocations are brought forward.</p> <p>Emphasise importance of early and continued detailed discussions over proposed allocations in Market Drayton, to ensure UU can appropriately support future delivery. Once information is available with respect to specific development sites (often only at the planning application stage), will be able to better understand the potential impacts of development on infrastructure and if necessary coordinate delivery of development with water infrastructure improvements. Recommend inclusion of a policy in the draft Shropshire Local Plan to this effect.</p> <p>Strongly advise relevant future applicants contact UU at the earliest stage (ideally before land transactions and certainly prior to any application) to explore infrastructure options. Important to highlight limited information on details of the development proposals is available - free Pre-App Service available (details in representation).</p> <p>All UU assets and associated easements need to be afforded due regard in the masterplanning process and may impact on deliverability dependent on location within a site.</p>
A0671	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP22	Not Specified	Not Specified	Not Specified	<p>Welcome approach proposed in draft Policy DP22 and site specific policies in Market Drayton regarding sustainable drainage.</p> <p>Also welcome draft Policy DP22 reference to links between sustainable drainage and green infrastructure - consider Local Plans should proactively and holistically address Climate Change by including a requirement for sustainable management of surface water through multi-functional benefits which are part of a high quality green/blue water environment.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0669	B001	<p>Revise the Viability Assessment undertaken to inform the draft Shropshire Local Plan to include consideration of the need for developer contributions towards NHS Trusts' critical infrastructure requirements arising from growth in population proposed in the Draft Shropshire Local Plan.</p> <p>Update Place Plans, Infrastructure Plan, CIL, and all supporting infrastructure documents referred to by the draft Shropshire Local Plan draft Policies, include reference to the need for the NHS Trusts' infrastructure requirements with regular on-going engagement between the Council and the trusts.</p> <p>Add the NHS Trusts (Midlands Partnership Foundation NHS Trust (MPFT) and Shropshire Community Health NHS Trust (SCHT)), as critical infrastructure bodies, into the list of bodies the Council intent to work in partnership with to ensure essential infrastructure is delivered across the plan period.</p> <p>Amend para 1 of draft Policy DP25 to include the following additional paragraph after existing text: "The infrastructure requirements will be set out in the Local Infrastructure Plan, Shropshire Place Plans, Strategic Infrastructure Implementation Plan, Local Infrastructure List, Site Allocations Policies and masterplans."</p> <p>Amend para 4.226 of the proposed explanation to draft Policy DP25 to include "including critical healthcare infrastructure identified by the Midlands Partnership Foundation NHS Trust (MPFT) and Shropshire Community Health NHS Trust (SCHT)..." following existing reference to health facilities.</p>	<p>The Shropshire Viability Assessment includes consideration of CIL and an initial assumption of £5,000/unit of S106 contributions on sites of 50 or more dwellings towards infrastructure costs. It does not commit these funds to any specific infrastructure requirements and it is considered that these are reasonable assumptions to underpin this assessment. Draft Policy DP25 specifies that "For new development where the Community Infrastructure Levy (CIL) applies, priority will be given to using CIL funds to support any critical or statutory infrastructure requirements resulting from the development." As recognised within the representation, the explanation to draft Policy DP25 specifically includes reference to health care infrastructure as a form of critical infrastructure. Furthermore, draft Policy DP25 states that "On proposals where it is considered CIL funds will not be sufficient to meet the specific infrastructure needs of development, consideration will be given to applying additional Section 106 contributions for specific infrastructure items where this meets national requirements for planning obligations."</p> <p>Shropshire Council welcomes positive engagement with the NHS Trusts and would encourage them to join the strategic infrastructure forum established for Shropshire. We would also encourage engagement in the Place Plan process to identify critical statutory healthcare infrastructure requirements alongside all potential funding mechanisms (including national funding) available - particularly as much of the growth proposed within the draft Shropshire Local Plan is that resulting from natural change/migration captured within national population/household projections. Ultimately, the most appropriate funding source(s) will vary dependent on the nature of the scheme and this will allow for a coordinated approach to delivery of this critical infrastructure - for instance CIL funding must be used on infrastructure (capital projects, although associated revenue spending to maintain those capital items is also permissible) and cannot be used to resolve existing deficits unless needed to support new development) whilst S106 funding must be necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p> <p>With regard to proposed changes to draft Policy DP25, it is not considered appropriate to reference specific sources of information in para 1 of the draft Policy, as this may limit the ability to respond to information emerging through the Planning Application process or other emerging sources of infrastructure requirements. However, the documents referenced within the representation are of course relevant sources of information in this context.</p> <p>With regard to proposed changes to the proposed explanation of draft Policy DP25, this already includes reference to health care infrastructure, which can of course include the critical statutory healthcare infrastructure requirements of the NHS Trusts, as such it is not considered necessary to make any amendments in order to recognise this. Furthermore the explanation does not make reference to specific infrastructure providers as this would be very extensive and of course often evolves over time. Rather the Place Plans (live documents), and the associated Strategic Infrastructure Implementation Plan, are considered the most effective means of identifying infrastructure requirements and providers.</p>	No
A0670	B001	N/A	<p>Noted. Shropshire Council considers that the proposed development strategy for Hadnall and the proposed allocation identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). The proposed allocation have been informed by a proportionate and robust site assessment process. The proposed development boundary is also considered appropriate.</p>	No
A0671	B001	<p>Recommend inclusion of a policy in the draft Shropshire Local Plan regarding coordinating delivery of development with water infrastructure improvements.</p> <p>Amend draft Policy S11 to include "Sites must allocate provision for the management of surface water through the use of sustainable drainage systems with multi-functional benefits as part of a high quality green and blue water environment in line with Policy DP22. Development with such features should consider the topography of the site to understand and design around any naturally occurring flow paths and any low lying areas within the proposal where water will naturally accumulate."</p>	<p>Noted. Para 4 of draft Policy DP19 includes "...proposals should show how development will be phased to allow the relevant water company sufficient time to undertake any necessary capacity improvement works to the existing water supply, wastewater and foul drainage networks and waste-water treatment works prior to construction and occupation of the development..."</p> <p>The draft Shropshire Local Plan should be read as a whole. Draft Policy DP22 comprehensively addresses sustainable drainage and applies to all proposed developments, including proposed allocations, in Shropshire.</p>	No
A0671	B002	N/A	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0671	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	Not Specified	Not Specified	Not Specified	United Utilities owns assets which may require upgrades in the near future, that are situated in the countryside. Important to ensure any required upgrades/expansions to these sites can be undertaken to meet infrastructure requirements of proposed future development and respond to environmental agendas in accordance with obligations. Request the draft Shropshire Local Policy and proposals map recognise that utility sites, located within the countryside are appropriate for development for operational purposes. Assets include: Woore Serviced Reservoir; Land at Bearstone Borehole; Adderley Wastewater Treatment Works (WWTW); Calverhall WWTW; and Oswestry Water Treatment Works (WTW).
A0671	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S14.1	Not Specified	Not Specified	Not Specified	Oswestry and Llanforda Reservoir and WTW is located adjacent to Oswestry's proposed Development Boundary. The asset is operational but includes surplus land following recent major investment, which is appropriate for alternative uses. The Vyrnwy Aqueduct, passes through Oswestry. This should be a consideration when allocating future development sites (note this asset passes through a number of existing/proposed allocations). This infrastructure is imperative to the water distribution network and the Council and relevant site promoters must have detailed understanding of associated constraints, legal easements and the need for unrestricted access for operation/maintenance - will not permit development over or in close proximity to it. Future developers of relevant sites should (the Council should encourage future developers of relevant sites to) contact United Utilities early in the process to ensure consideration of the Vyrnwy Aqueduct in design and layout of development - free Pre-App Service available (details in representation).
A0671	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP19	Not Specified	Not Specified	Not Specified	United Utilities' strong preference is for development to take place outside any Environment Agency designated Source Protection Zone 1 (SPZ1). Welcome the provision within your adopted development plan policy relating to groundwater, recommend this is strengthened - draft Policy provided within representation. Also, development proposals (particular reference to wind) on water catchment land can have an impact on water supply resources. Recommend inclusion of a policy which identifies the need to engage with the statutory undertaker for water to determine whether any proposal is on land used for public water supply catchment purposes.
A0671	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Not Specified	Not Specified	Not Specified	In regards to health, well-being and maximising the quality of residential amenity, it is more appropriate to locate sensitive uses (such as residential) away from existing sources of noise and odour (particular reference to waste water treatment works). This should be reflected in site assessment process. Pleas proposed allocations are located away from our wastewater treatment works.
A0671	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	General Comments	Not Specified	Not Specified	Not Specified	Note a previous consultation included a call for sites for Gypsies and Travellers. Would welcome early dialogue on any resulting proposed allocations to advise on infrastructure concerns. Have a strong preference for sites to be located away from any groundwater source protection zones, land used for water catchment purposes and away from any of our wastewater treatment works.
A0672	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	Not Specified	The definition of Hub has been tweaked in the Hierarchy of Settlements. One cannot help but wonder why, given the wording of para 5.41, it is no longer a requirement that a Hub can provide both significant employment and peak time public transport. Is this an attempt to squeeze the criteria to fit certain locations? Climate change and sustainability are arguably the major issues facing us at the moment, as many young people will tell us. The reduction of carbon emissions and car travel are important and the relaxation of this wording could be seen as contrary to Objectives SO5, 6 and 12.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0671	B003	Policy and the proposals map recognise that utility sites, located within the countryside are appropriate for development for operational purposes. Assets include: Woore Serviced Reservoir; Land at Bearstone Borehole; Adderley Wastewater Treatment Works (WWTW); Calverhall WWTW; and Oswestry Water Treatment Works (WTW).	Noted. The draft Shropshire Local Plan recognises the need for the provision of appropriate infrastructure, to support sustainable communities and the delivery new development as set out in a range of draft policies including DP19, DP25 & DP26. DP19 requires adequate water infrastructure for development and DP26 relates specifically to strategic infrastructure, including that required for water management. As well as new strategic infrastructure provision, draft Policy DP26 identifies the import of ensuring the continued operation and potential for necessary expansion of existing strategic infrastructure. Requirements for infrastructure development in the countryside, are referenced in part (e) of Policy SP10 in the countryside but a minor modification to also include specific reference to infrastructure in paragraph 2 of the Policy would provide further clarity. Existing water infrastructure is appropriately identified in the Water Cycle Study which forms part of the evidence base for the Draft Plan.	Yes
A0671	B004	Oswestry and Llanforda Reservoir and WTW is located adjacent to Oswestry's proposed Development Boundary. The asset is operational but also includes surplus land following recent major investment, which is appropriate for alternative use consideration. The Council should encourage applicants on relevant sites to contact Unite Utilities in order to consider implications of presence of Vyrnwy Aqueduct under their site.	Noted. Shropshire Council considers the proposed development strategy for Oswestry and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Proposed site allocations have been informed by a proportionate and robust site assessment. Shropshire Council also considers that the proposed development boundary is appropriate. Draft Policy DP19 includes "Development must not adversely affect the quality, quantity and flow of both ground and surface water and must ensure that there is adequate water infrastructure in place to meet its own needs."	No
A0671	B005	Include a policy regarding development in Source Protection Zones (suggested policy provided within representation), this includes that "Any proposals for new development within Groundwater Source Protection Zones must accord with Environment Agency guidance set out in its document titled 'The Environment Agency's approach to groundwater protection', or any subsequent iteration of the guidance." and "New development within Groundwater Source Protection Zones will be expected to conform..." with requirements specified for masterplanning; risk assessment; and construction management plans. Include a policy regarding water catchment land and the need to engage with the statutory undertaker for water to determine whether any proposal is on land used for public water supply catchment purposes (suggested policy provided within representation).	The Council considers that the Policy provides appropriate and adequate protection for groundwater Source Protection Zones	No
A0671	B006	N/A	Noted. The site assessment process undertaken to inform proposed allocations includes comments from colleagues in Public Protection on issues such as noise and odour. We would also note that draft Policy DP18 specifically addresses these issues in the context of development proposals.	No
A0671	B007	N/A	Noted. Shropshire Council is not proposing to allocate any specific sites for Gypsy and Travellers within the draft Shropshire Local Plan. The Gypsy and Traveller Accommodation Assessment (2019 Update) does not identify a requirement for such allocations.	No
A0672	B001	The Village Design Statement for Trefonen Treflach and Nantmar (2006 and 2016) make it absolutely clear that Trefonen neither offers significant employment opportunities nor does it enjoy any peak time public transport, unless you are a school child. The designation of Trefonen as a Hub should be changed. It should be designated 'Other rural' and deleted from Policy S14.2 Community Hubs – Oswestry Place Plan Area. We envisaged a small number of Affordable Homes, houses and bungalows which would meet the needs of starters on the housing ladder, those wishing to down-size, and those with specific access needs. Large scale developments are inappropriate. We wish to see Trefonen designated as Other Rural with Affordable Homes provided by the Rural Exceptions Policies DP4, 5, 6 and 7.	Shropshire Council considers that the methodology applied within the Hierarchy of Settlements Assessment is appropriate and has been applied consistently across Shropshire. Whilst the data relating to the availability of services and facilities, public transport, significant employment opportunities and high-speed broadband have been appropriately and consistently updated within the Hierarchy of Settlements Assessment, the methodology used and application of the Hierarchy of Settlements Assessment has remained consistent. Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment. As such it is considered appropriate for Trefonen to be identified as a proposed Community Hub. Shropshire Council also considers that the development strategy proposed for Trefonen, which has been informed by consideration of the specific characteristics, constraints and opportunities that exist within the village, is appropriate, effective, sustainable and deliverable.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0673	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	No	<p>Object to the draft Shropshire Local Plan as it does not positively or effectively respond to cross-boundary strategic matters.</p> <p>The draft Shropshire Local Plan proposes a 30ha contribution to unmet cross-boundary need for employment land arising in the Black Country. Evidence for this is set out in the Economic Development Needs Assessment (EDNA), which identifies strong labour market linkages with the Black Country and Wolverhampton in particular, and recommends close co-operation on employment land supply.</p> <p>The Black Country employment land requirement ranges from 592ha (baseline) to 870ha (aspirational growth based on WMCA SEP). Existing urban employment land supply is around 305ha, leaving a shortfall of between 287ha and 565ha, depending on the growth scenarios applied. All opportunities to bring forward additional employment land within the urban area and Green Belt are being considered, but this exercise will not make a significant impact upon addressing unmet need. Work is also ongoing to find other sources of supply including some proportion of the consented West Midlands Interchange (WMI). Contributions through Duty to Cooperate are currently limited to 50ha in total (including the 30ha in the draft Shropshire Local Plan). As such apparent there will be a significant quantitative shortfall of employment land in the Black Country.</p> <p>The West Midlands Strategic Employment Sites Study (currently being updated) and West Midlands Land Commission Report respectively found the Black Country and southern Staffordshire has a severe lack of strategic minimum 25ha employment sites (this remains the case and was recognised during the recent decision on the WMI) and the shortfall of land for employment space is at least as pressing as that for housing. As such it is apparent there will be a significant qualitative shortfall of employment land in the Black Country and there are very limited locations where this need can be met.</p> <p>The quantitative employment land requirement for Shropshire identified in the EDNA is between 164ha and 264ha (including the 30ha Black Country contribution). The current supply is some 276ha and the Plan target 300ha. This suggests headroom to increase the employment land contribution to the Black Country.</p> <p>Employment sites in Shifnal and Bridgnorth, given size and distance from the motorway network (limits range of potential occupiers as unlikely to be attractive to large scale and footloose inward-investment), could be assumed capable of contributing to non-strategic needs arising in the Black Country. This is consistent with the findings of the EDNA, which acknowledges demand for 'Big Box' units (10,000 sqm plus) has been generally limited in Shropshire. However, this is in part due to the lack of readily available and suitably located, high quality larger stock (the EDNA concludes newly developed modern stock has largely catered to smaller occupiers and trade counter uses and much of the existing larger stock is dated and in need of refurbishment to meet requirements of modern occupiers).</p> <p>As such, given the scale of the qualitative and quantitative unmet need, consider the proposed employment land contribution to cross boundary need should be increased. Consider current proposals are not sufficient to respond positively or effectively to cross-boundary strategic matters given the scale of quantitative and qualitative needs and the size of Shropshire relative to neighbours. Any increase to this offer should also reflect qualitative factors including significant demand for advanced logistics premises in locations with good access to the M54 (identified as a key strategic corridor in the Strategic Options Study). There is also a need to review how much employment land could sustainably and practically be delivered on proposed allocations (Shifnal and Bridgnorth) and through continuing consideration of strategic sites. In particular, land to the north of M54 Junction 3 (strongly supported by ABCA in previous consultations) has been promoted as a potential Strategic Employment Site, with potential to provide 75ha of employment land. This could complement development at Shifnal and take up opportunities that might arise at Cosford - support this proposal and take the view the draft Shropshire Local Plan should support a strategic settlement in this location which would also help to meet the housing needs of the Black Country.</p>
A0673	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	No	No	<p>Object to the draft Shropshire Local Plan as it does not positively or effectively respond to cross-boundary strategic matters.</p> <p>Proposals include a 1,500 dwelling contribution to meeting needs arising in the Black Country. Whilst proposal at Bridgnorth and Shifnal could make some contribution to Black Country needs, given existing migration patterns, geographical proximity and physical links. However, they are not strategic and do not benefit from direct access and visibility from the M54 corridor. Further, likely a shortfall of land to meet Black Country housing needs will remain, even with this and likely contributions within other emerging neighbouring Local Plans.</p> <p>The Black Country evidence (Urban Capacity Review (UCR) Update 2019) demonstrates a need for 71,500 homes between 2019 and 2038, of which 44,500 homes can be accommodated in the urban area leaving a shortfall of 27,000. This shortfall is likely to increase by around 5,000 homes as a result of recent changes to the calculation of local housing need. An UCR Update 2020 will shortly be published calculating an up-to-date shortfall figure, which will inform a forthcoming consultation on the draft Black Country Plan. Evidence clearly demonstrates the Black Country cannot accommodate all of its needs in the urban area.</p> <p>In terms of non-urban opportunities, assessments undertaken (Green Belt, Landscape Sensitivity, Historic Landscape Characterisation and Ecological surveys) severely constrain capacity to deliver large scale development across much of the Black Country. Market deliverability is also being assessed, but consider this will also limit capacity (based on experience in Birmingham, where capacity of an urban extension was reduced from 10,000 to 5,000 over the 15 year plan period and this was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands). The majority of the Green Belt is located in Walsall and to a lesser extent Dudley, so these are the two main housing market areas with potential for Green Belt housing, based on a scenario that there is sufficient unconstrained capacity in the Black Country Green Belt, a deliverability study may reasonably conclude capacity for some 10,000 homes in the Green Belt over the 15-year Plan period, leaving a significant shortfall to be met in neighbouring authorities.</p> <p>Duty to cooperate discussions with neighbouring Local Authorities have resulted in a number of local authorities (including South Staffordshire, Lichfield, Cannock and Shropshire) indicating they will seek to test ability to accommodate additional housing need over and above their own as part of Local Plan Reviews (anticipate as a best-case scenario they could accommodate up to 10,500-12,500 homes, leaving a significant shortfall of approximately 14,550-16,500 houses (plus 5,000 homes as a result of the change to the calculation of local housing need). However, there is no certainty these contributions will come forward.</p> <p>Therefore important firm commitment is made now as part of the Shropshire Local Plan Review, the most advanced of all the neighbouring plans, and these commitments are capable of meeting identified strategic needs. Request the Shropshire Local Plan increases its housing requirement by 3,000 to incorporate up to 4,500 dwellings to support the housing needs of the emerging Black Country Plan. Some 1,500 of this could be met by proposed housing allocations around Shifnal and Bridgnorth, with the addition of up to 3,000 dwellings to be met at Land to the north of Junction 3 of the M54 as part of a new Strategic Settlement (strongly supported by ABCA in previous consultations).</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0673	B001	<p>Provide a significantly larger contribution to unmet cross-boundary need for employment land arising in the Black Country. This should reflect the quantitative and qualitative needs of the area.</p> <p>Review how much land could sustainably and practically be delivered on the sites identified in the draft Shropshire Local Plan and consider potential strategic sites, particularly land north of M54 of Junction 3, which should be allocated for development to meet the cross-boundary needs arising in the Black Country.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed employment land requirement and proposed employment land supply are also considered appropriate, effective and sustainable.</p> <p>The proposed employment land requirement seeks to support the achievement of the aspirations of the Economic Growth Strategy for Shropshire through the provision of sufficient appropriately located land to deliver high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable and also responds to key quantitative and qualitative evidence including that within the Economic Development Needs Assessments (EDNA), Employment Land Review (ELR) and Authority Monitoring Report (AMR) undertaken to inform the draft Shropshire Local Plan. In order to achieve the proposed employment land requirement, respond to the wider range of employment uses now being accepted in the draft Shropshire Local Plan and respond to the varying needs of employers and local communities (including reflecting the diverse needs of the resident labour force), it is considered important to provide choice and competition in the market. There is also a need to provide sufficient land to off-set the re-use of existing employment land for other purposes. As such, a satisfactory supply of land will inevitably exceed the proposed employment land requirement. It is considered that the draft Shropshire Local Plan has achieved this objective by proposing an employment land requirement of 300ha against a proposed employment land supply that exceeds 400ha (as documented within Appendix 6 of the Draft Shropshire Local Plan and the Authority Monitoring Report 2020). This supply includes a range of types of site (size, location and quality) to satisfy demands for employment land throughout the proposed Plan period to 2038.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p>	No
A0673	B002	<p>Increase the proposed housing requirement by 3,000 to incorporate up to 4,500 dwellings to support the housing needs of the emerging Black Country Plan. Some 1,500 of this could be met by proposed housing allocations around Shifnal and Bridgnorth, with the addition of up to 3,000 dwellings to be met at Land to the north of Junction 3 of the M54 as part of a new Strategic Settlement (strongly supported by ABCA in previous consultations).</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0673	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP29, DP30, DP31, DP32 and DP33	Not Specified	No	No	Evidence indicates facilities in Shropshire provide for both minerals and waste requirements arising in the Black Country. With regard to minerals, availability of aggregates has been in excess above minimum guidelines and the Plan does not propose any additional site allocations. With regard to waste, existing consented facilities are anticipated to provide sufficient capacity to accommodate forecast throughput negating the need for additional facilities.
A0673	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	Not Specified	No	No	Given the scale of the quantitative and qualitative shortfall in the Black Country and based upon the evidence available, consider statements saying issues in the draft Shropshire Local Plan might be subject to review insufficient. Instead a more firm undertaking to conduct an early review should be made in the Plan to ensure that it provides clear commitment to help meet projected development needs for the future.
A0674	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	Not Specified	Not Specified	Not Specified	Support the aspirations of the draft Shropshire Local Plan and that it seeks to deliver sustainable development in the appropriate locations providing the right mix of new housing, employment etc.
A0674	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	Support the strategic approach set out in the draft Shropshire Local Plan, which seeks to deliver 30,800 new dwellings between 2016 to 2038. Also welcome identification of Market Drayton as a 'Principal Centre' where development is directed.
A0674	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Not Specified	Not Specified	Not Specified	Support the Council's aspirations for high quality design, which is an important requirement for new development in the County. Aspirations for sites MDR014 and MDR031 seek to deliver high quality design with the proposals carefully designed to provide a local distinctiveness, high quality materials, which seeks to utilise solar gains and integrate Green Infrastructure and sustainable drainage opportunities.
A0674	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	Not Specified	Not Specified	Support premise of allowing unallocated sites within settlement boundaries. Suggest an amendment to para 2 of draft Policy SP7 to read: "In particular, additional housing development opportunities which would support the development of previously developed sites, or greenfield sites within settlement development boundaries as shown on the Policies Map; or contribute towards achieving wider town centre regeneration will be supported." Such an amendment would allow for an appropriate level of windfall sites to come forward, as envisaged in the proposed Plan period, as worded it only allows for the reuse of disused land or premises.
A0674	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10	Not Specified	Not Specified	Not Specified	Support the principle of development within existing settlements. Such an approach should be brought forward within the Council's allocations, which seeks to allocate land within the countryside, where there are still potential sites within settlement boundaries to meet the housing need.
A0674	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP12	Not Specified	Not Specified	Not Specified	Support and welcome the Council's approach to economic development. Particularly in these current times, need to ensure support to economic generation. However, it is important that the draft policy considers recent amendments to the use class order, and that employment generation isn't restricted to just the old B uses. A number of different commercial uses such as care homes and nurseries, for example, can employ a greater number of employees than some traditional B uses.
A0674	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	Not Specified	Not Specified	Note and support the aspiration to deliver a mix of properties on a development. However, within para 2 of draft Policy DP1, the threshold proposed of 5 units is too low and too hard to implement on a practical scale. Suggest a threshold of 20 or more dwellings is implemented.
A0674	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1(6)	Not Specified	No	Not Specified	Plan fails to adequately provide for the need for the growing older person population. Specific allocations should be made for retirement living.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0673	B003	N/A	Noted.	No
A0673	B004	Recognise there could continue to be a shortfall of land in neighbouring areas to which could be accommodated within the Plan area. Include this as a key trigger for an early review of the draft Shropshire Local Plan.	There is a legal requirement to review Local Plans every five years (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012). Furthermore, para 33 of the National Planning Policy Framework (NPPF) states "Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future." This requirement is also specifically recognised within para 2.16 of the introduction to the draft Shropshire Local Plan. We would also note that proposed changes to the plan making process within the Planning for the Future White Paper, if ultimately introduced, could also require a review of the Local Plan. As such, it is considered unnecessary to include a specific early review mechanism within the draft Shropshire Local Plan.	No
A0674	B001	N/A	Noted.	No
A0674	B002	N/A	Noted.	No
A0674	B003	N/A	Noted.	No
A0674	B004	Suggest an amendment to para 2 of draft Policy SP7 to read: "In particular, additional housing development opportunities which would support the development of previously developed sites, or greenfield sites within settlement development boundaries as shown on the Policies Map; or contribute towards achieving wider town centre regeneration will be supported."	Noted. The draft Shropshire Local Plan should be read as a whole. It is considered that the draft policies in the draft Shropshire Local Plan provide an effective framework for managing windfall opportunities within development boundaries.	No
A0674	B005	n/a	Noted.	No
A0674	B006	It is important that the draft policy considers recent amendments to the use class order, and that employment generation isn't restricted to just the old B uses. A number of different commercial uses such as care homes and nurseries, for example, can employ a greater number of employees that some traditional B uses.	The draft Shropshire Local Plan should be read as a whole. It is considered that draft Policies SP12 and other relevant policies such as draft Policy SP13 and SP14 appropriately consider and provide a framework for consideration of employment generating uses. Policy SP13 refers to the correct use classes as defined in the amendments of Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020	No
A0674	B007	Amend the threshold in para 2 of draft Policy DP1 to 20 dwellings.	Noted. Shropshire Council considers that it is appropriate for draft Policy DP1 to require all residential development to provide a mix of dwelling sizes, types and tenures in order to meet the identified needs of local communities. It is also considered appropriate for sites of 5 or more dwellings to include a mix which specifically responds to evidence of local need either through a recent 'Right Home Right Place' or equivalent survey or the need identified within the Strategic Housing Market Assessment (SHMA) undertaken to inform the draft Shropshire Local Plan.	No
A0674	B008	Allocate specific sites to meet the needs of the older population.	It is considered that the proposed approach to meeting the housing need of older people within the draft Shropshire Local Plan is clear and appropriate. Specifically: -Draft Policy DP1 requires all residential development to provide appropriate dwelling mixes to meet the identified needs of local communities, including older people. It also specifically requires the provision of an appropriate range of specialist housing designed to meet the diverse needs of older people on sites of 50 or more dwellings. -Settlement policies (S1-S19) allow for appropriate windfall development within identified development boundaries (or in the case of Community Clusters on specified types of sites) where they comply with other policy requirements, which can of course include accommodation for older people. -Draft Policy SP10 allows for affordable exception, entry level exception and cross subsidy exception housing schemes which meet evidenced local housing needs and other policy requirements. This again can include appropriate tenures of older person accommodation.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0674	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP5	Not Specified	Not Specified	Not Specified	Support the Councils aspirations in line with the National Planning Policy Framework (NPPF) for the delivery of modest entry level homes schemes to assist first buyers or renters.
A0674	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	No	Not Specified	Object to Point 4 of draft Policy SP11. This does not comply with para 145(g) of the National Planning Policy Framework (NPPF), which does not limit redevelopment of previously developed land in the Green Belt to affordable housing rather than market homes and there is significant case law to substantiate this. The merits of such sites and the form of development proposed should be considered on the balance/test of openness and other policies in the draft Shropshire Local Plan and not limit the tenure of housing. As also demonstrated in case law, para 145(g) of the NPPF does allow for up to substantial harm in the Green Belt where affordable homes are being provided in an area of affordable housing need.
A0674	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP27	Not Specified	No	Not Specified	Welcome aspirations to improve Broadband capacity. However, object to point 3 of draft Policy DP27 as it is hard for developers to deliver such requirements, as this has to be delivered by infrastructure providers who developers have little influence/control over.
A0674	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1	Not Specified	No	Not Specified	Support Para 1 of draft Policy S11.1 and the aspiration to deliver around 1,200 homes in Market Drayton. Also support the ability for windfall sites to come forward within the settlement boundary (para 2 of draft Policy S11.1). However, object to delivery of the housing, the approach taken, the site selection the sustainability appraisal and the level of allocations per site – set out in representation A0674 B013.
A0674	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S11.1	Not Specified	No	Not Specified	Object to paras 3 and 4 and proposed allocations MDR039 and MDR043; MDR012; MDR034; and MDR006. Consider development north of the A53 (applies to all these sites) would harm Market Drayton's character, impact on a sensitive landscape and encroach on the countryside. The site assessment process fails to appropriately consider sites in alternative locations. These sites are also subject to viability/deliverability issues. -MDR039 and MDR043 are physically detached from and have poor access links to Market Drayton (photos provided in representation). The Sustainability Appraisal (SA) identifies the sites as poor, with access to services a key consideration. The Inspector of the Market Drayton Neighbourhood Plan considered the site unachievable/unviable. Site assessment also fails to demonstrate there are no alternative locations for sports facilities/existing facilities cannot be upgraded and no specific viability assessment has been undertaken. -Sites MDR012 and MDR034 are subject to a number of constraints including partial location in flood zone, distance to services/facilities and proximity to a listed buildings (as documented within the SA). The Inspector of the Market Drayton Neighbourhood Plan considered these sites not achievable/viable. It is unclear whether the sites include delivery of a marina and whether the site is viable/deliverable. With regard to MDR034 as 35% of the site is located in flood zones 2/3 its has not been demonstrated how the proposed housing guideline for the site can be accommodated (this could also impact on viability/deliverability). -MDR006 is detached from Market Drayton and subject to a number of constraints including distance to services/facilities (as documented within the SA). The viability/deliverability of the site (including proposed policy requirements) is not demonstrated. Sites MDR014 and MDR031 provide a deliverable alternative and consider it should be included as a proposed allocation. These sites are suitable, available and achievable for housing or employment development. Initial masterplans for the sites provided within the representation (showing much needed retirement housing which also creates jobs on MDR014 and housing/various forms of open space on MDR031). If both are allocated they could open up the Tern Valley as a natural green space. Space has been left for a potential community facility/revisions could be made for a larger facility. The land is in a single ownership and can be brought forward quickly to meet the need/ make a significant contribution to the local community and environment of Market Drayton/Shropshire and requirements of the National Planning Policy Framework.



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0674	B009	N/A	Noted.	No
A0674	B010	Amend para 4 of draft Policy SP11 to allow reuse of previously developed land within the Green Belt for open market housing.	Noted. Draft Policy SP11 identifies circumstances when development may be acceptable in line with National Policy, whilst also providing appropriate additional clarification in the Shropshire context. Para 5 of the draft Policy seeks to enable appropriate reuse of previously developed land to meet identified local affordable housing need, 'where it can be demonstrated not to cause substantial harm to the openness of the Green Belt'. This proposed policy requirement is considered consistent with the proposed strategic approach to development outlined within draft Policy SP2 which states that outside identified settlements, 'new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification' and the proposed Policy approach within draft Policy SP10 regarding development in the countryside. We would also note that this proposed approach is consistent with that within the adopted Local Plan.	No
A0674	B011	Review para 3 of draft Policy DP27.	Shropshire Council is working to improve broadband connectivity across the County through its Connecting Shropshire programme to attract commercial superfast broadband infrastructure investment and to bring faster broadband to areas where it is not economically viable for commercial operators to provide these services. The purpose of these objectives for connecting Shropshire to the best electronic communications infrastructure into their business premises and homes is to ensure businesses, employees and residents can embrace and optimise the use of broadband in their everyday lives. Unless the development market also embraces these objectives in their development design schemes and build specifications through the provision of network infrastructure and fibre to premises technologies then the roll out of digital connectivity will not be achieved and Shropshire will struggle in its programme to move towards and achieve the broader objective of creating a zero carbon economy in the County.	No
A0674	B012	Allocate sites MDR014 and MDR031 instead/in addition to proposed allocations DR039 and MDR043; MDR012; MDR034; and MDR006.	Shropshire Council considers that the proposed development strategy for Market Drayton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Site allocations have been identified through a proportionate and robust Sustainability Appraisal and site assessment process.	No
A0674	B013	Allocate sites MDR014 and MDR031 instead/in addition to proposed allocations MDR039 and MDR043; MDR012; MDR034; and MDR006.	Shropshire Council considers that the proposed development strategy for Market Drayton and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Site allocations have been identified through a proportionate and robust Sustainability Appraisal and site assessment process.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0675	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S17	Not Specified	Not Specified	Not Specified	<p>Relieved concerns about traffic congestion east of the level crossing in Wem have been taken into account. Removal of the level crossing would divide the town into two parts, significantly damage retail businesses operating in Wem High Street and increase the number and length of car journeys. As such, this option is not available and residents have to live with existing congestion, but they do not want it (and associated problems) exacerbated. Further development in this area would lead to just that situation. Also encouraged that the integrity of small settlements, such as Aston, has been maintained.</p> <p>All 'sensible' areas for development at Wem have been taken but the town still has to develop, so it is a case of choosing the least damaging options. There will be concerns about all the three proposed allocations, but we are where we are. However, would ask for reconsideration of WEM025. The ecological value of this area is clearly recognised by the Council, since numerous mitigation measures are required. All area aware that such mitigation measures have differing degrees of success.</p> <p>Additionally, any development should have regard to neighbouring developments and the character of the town, rather than appearing parachuted in - matching the shades and types of bricks really does not cut it.</p> <p>Pleased that development proposals will be expected to positively respond to policies and guidelines identified within the Wem Town Design Statement any other relevant community-led plans and any master plans adopted by Shropshire Council.</p> <p>During the last Regulation 18 consultation, requested that the development boundary on Mill Street be amended so an area of open land would be excluded from development. Many Wemians feel strongly that development should not take place on this site as it is a key gateway, provides essential green space and natural/historic environment concerns (numerous applications refused on the site). Adjustment of the development boundary in this area would have a minimal impact on the development of Wem but a major and positive impact on the environment of Wem.</p>
A0676	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP9	Yes	No	Yes	<p>Draft Policy DP9 which relates to managing and supporting town centres is not sound as it has not been positively prepared, it is not justified or effective, and it is not consistent with national policy as it fails to recognise local centres such as Bicton Heath as suitable and appropriate locations for new main town centre uses.</p> <p>Bicton Heath is a defined local centre identified for expansion in both the adopted SAMDev Plan and Shrewsbury West Sustainable Urban Extension (SUE) Masterplan (Masterplan specifically identifies land to expand the local centre). Recognise draft Policy DP9 appears to support neighbourhood based local shopping within the new residential developments such as SUE's, however, the draft Policy only refers to a preference to accommodate retailing within Town Centres, Principal Centres and Key Centres, adding that proposals outside these centres will need to satisfy the sequential and impact test. In short, a Planning Application on the site identified for the expansion of Bicton Heath Local Centre might need to demonstrate there are no sites within Town Centres, Principal Centres and Key Centres. This cannot be correct, and it is inconsistent with the National Planning Policy Guidance (NPPG), which confirms Local Centres (which have an important role in meeting needs) should be treated as Town Centres in retail policy. As such, Local Centres such as Bicton Heath which is earmarked for expansion should be recognised in draft Policy DP9 as a suitable location for retail and main town centre uses to help serve and provide services/facilities for existing and new residents within the SUE.</p>
A0676	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Yes	No	Yes	<p>Draft Policy DP11 relates to minimising carbon emissions, stating that new non-residential development of 1,000m2 or more floorspace or with a gross site area of 1ha or more will achieve the BREEAM Excellent rating or equivalent standard within an alternative assessment endorsed by Shropshire Council.</p> <p>Support the need to minimise carbon emissions, however, such a blanket requirements will potentially impact on the viability of future proposals. Vital the planning system encourages business/investment and employment as a result of factors such as Covid 19 and economic recession. As such request the draft Policy is amended to state that the BREEAM Excellent rating will be achieved where this is feasible and/or viable or the draft Policy could use wording such as 'seek to achieve'. This would mean that in cases where it is not technically possible to meet this or it would impact on the viability of a scheme, the Council would be agreeable to a lower BREEAM rating.</p>
A0676	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.1	Yes	No	Yes	<p>Supportive of draft Policy S16.1. However consider for clarity, the draft Policy should be reworded to recognise and support expansion of the Local Centre at Bicton Heath as part of the Shrewsbury West Sustainable Urban Extension (SUE) and the new Local Centre within the Shrewsbury South SUE, to help meet current and future residents shopping needs.</p>
A0677	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Para 2.27	Not Specified	Not Specified	Yes	<p>Note the consultation document states a full set of Statements of Common Ground will be made available ahead of the submission of the draft Shropshire Local Plan. Ask that wider issues raised in representation are considered and addressed.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0675	B001	Amend the development boundary to exclude an area of open land on Mill Street is excluded. Reconsider proposed allocation WEM025.	Noted. Shropshire Council considers that the proposed development strategy for Wem and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Shropshire Council also considers that the proposed development boundary is appropriate. We would note that with regard to the design of development, a draft Policy (SP5) specifically on high-quality design is proposed within the draft Shropshire Local Plan. Furthermore draft Policy S11.1 recognises development proposals should positively respond to community-led plans, this includes in relation to design.	No
A0676	B001	Amend paras 1-5 of draft Policy DP9 (representation lays out proposed changes). In summary: Para 1: Include "and new and existing Local Centres" as locations to maintain and enhanced the vitality and viability. Para 2: At the end of the paragraph add "as well as within and adjacent to new and existing Local Centres where they are proposed to be expanded." Para 3: Include "Principal Centres" and "new and existing Local Centres including where they are proposed to be expanded" as a locations for main town centre uses and locations that need to be considered when undertaking sequential assessment. Para 4: Include "Principal Centres" and "new and existing Local Centre" as locations the Council consider in the context of protecting against adverse impacts from proposals in edge and out of centre locations and locations to be considered in the context of Impact Assessments. Also with regard to Para 4 criteria C include "if they not within a defined centre" at the end of the existing sentence. Para 5: Include reference to "Principal Centres" and "new and existing Local Centre" as areas that Meole Brace and Sundorne Retail Parks are not located.	If the Local Centres are under 300sqm then no RIA will be required. Locally the issue of protecting Town Centres is important and the current approach is consistent with how the Retail Hierarchy has been applied to Local Centres as part of SUEs. As indicated on the Policy Maps, areas defined as "Town Centre," are located in the Principal Centres only.	No
A0676	B002	Para 2 of draft Policy DP11 should be amended as follows "New non-residential development of 1,000m2 or more floorspace or with a gross site area of 1ha or more will achieve the BREEAM Excellent rating or equivalent standard within an alternative assessment endorsed by Shropshire Council unless it can be demonstrated that it is not feasible or would impact on the viability of the proposal." Alternatively "seek to achieve" could be added to the para.	A Whole Plan Viability Assessment has been undertaken to inform policy requirements with the intention of ensuring the viability and deliverability of the draft Shropshire Local Plan. Draft Policy DP11 has been subject to due consideration within this assessment. No change proposed.	No
A0676	B003	Amend para 13 of draft Policy S16.1 to include "new services and facilities within the new and expanded local centres" as requirements of the respective Sustainable Urban Extension Masterplans (representation lays out proposed change).	The comments are noted. However, it is considered the current proposed policy wording is appropriate and provides a suitable policy framework with which to use agreed masterplans as material considerations in the delivery of the 'saved' SUEs to the south and west of the town. No change proposed.	No
A0677	B001	Note the consultation document states a full set of Statements of Common Ground will be made available ahead of the submission of the draft Shropshire Local Plan. Ask that wider issues raised in representation are considered and addressed.	Noted.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0677	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP16	Yes	No	Yes	The explanation of draft Policy SP16 states aggregate production remains above the 10 year average and landbanks for sand and gravel have remained above minimum levels required by national policy. It also explains a precautionary approach is being taken to the production requirement for sand and gravel using the 3 year average plus a growth allowance of 20%. However, no specific numbers/explanation is provided, nor does it cross-reference other sections of the draft Shropshire Local Plan which contain the detailed information. Para 3.158 states for sand and gravel "further significant windfall applications are expected". This appears at odds with part 4 of draft Policy SP16 which only supports sand and gravel working outside saved unimplemented allocations and existing permitted reserves where it would prevent sterilisation, significant environmental benefits would be obtained or proposed sites would be significantly more acceptable overall than the allocated sites. Para 4.269 supporting policy DP30 (Sites for Sand and Gravel Working) shows the windfall allowance of 10.5 million tonnes is significantly higher than the saved local plan allocations (of 4 million tonnes). Within the strict policy context of draft Policy SP16, can the Council be confident about relying on this scale of windfall development? Concerned this could lead to unplanned cross-boundary implications for the supply of sand and gravel if windfall development does not come forward as anticipated.
A0677	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP28	Yes	Yes	Yes	Due to the spatial distribution of development in the draft Shropshire Local Plan, some distance from Worcestershire, therefore have no concerns about the 'Duty to Cooperate' requirements or soundness of the draft Shropshire Local Plan from a transport perspective. Understandable the focus is on relationship to the Black Country given the location of the A5/M54 and the fact a large number of residents in Shropshire travel there to work. No mention is made to the Local Transport Plan (LTP) within the evidence base. This may be because the evidence base comprises documents solely to inform the draft Shropshire Local Plan. However, references are made to the LTP within the draft Shropshire Local Plan and its involvement in Policy delivery mechanisms and monitoring, particularly in relation to draft Policy DP28. Effectiveness of the draft Shropshire Local Plan will be determined by its deliverability. Note this has been considered in decisions to 'saved' or otherwise existing allocations. Cooperation with the Black Country Local Authorities in particular is in a large part based on the deliverability of housing and employment development given the interaction between the two areas. Throughout the document and in previous consultation documents, sustainability has been an underlying principle. This is in line with the National Planning Policy Framework (NPPF) and the presumption of sustainable development. The importance of a plan-led system is a central feature of the NPPF and the draft Shropshire Local Plan acknowledges the need to be flexible and to adapt to change to meet the development needs of the area. There is clear acknowledgement of the need for Shropshire to meet its housing need, tying into the delivery aspect of the 'effectiveness' test.
A0677	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP30	Yes	No	Yes	Draft Policy DP30 and its supporting explanatory text are useful in setting out the detailed policy and context for sand and gravel proposals. However, it is not clear why there is not an equivalent policy and supporting text for other types of mineral development, for example to clearly set out the levels of current permitted crushed rock reserves and allocations. Further to the above, draft Policy SP16 says "The broad extent of MSAs is defined on Figure SP15.1". Para 3.154 below this policy says they are shown on figure SP13.1. The figure below the policy showing the MSAs is titled Figure SP16.1. This may not be a soundness matter, but should be resolved for consistency.
A0678	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	No	No	No	Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable. The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan. Furthermore exceptional circumstances as required by para 137 of the National Planning Policy Framework (NPPF) have not been done.
A0678	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	No	No	No	Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements. There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0677	B002	Explanatory text supporting draft Policy SP16, should cross-reference appropriate section(s) and the minerals technical background report to ensure soundness, rather than necessarily requiring significant alterations to the text.	<p>Noted. For the purpose of clarity a minor modification is proposed to the proposed explanation to draft Policy SP16 to cross-reference the appropriate section of the Minerals Technical Background Paper.</p> <p>With regard to para 4 of draft Policy SP16, we would note that draft Policy DP30 clarifies that mineral working falling outside allocated areas will also be permitted where developers can demonstrate that the proposal would meet an unmet need/prevent sterilisation of resources; and not prejudice development of allocated sites/result in significant environmental benefits as a result of the exchange or surrender of existing permissions or the site might be significantly more acceptable overall than the allocated sites, and would offer significant environmental benefits.</p> <p>Shropshire Council is confident the scale of windfall development proposed will be delivered since this largely comprises extensions to existing sites. Reinforcing this, a new site for 1.9mt at Ironbridge / Buildwas has recently benefitted from a resolution to grant planning consent.</p>	No
A0677	B003	N/A	Noted. Shropshire Council is currently preparing the next Local Transport Plan (LTP4), which will be informed by proposals within the Local Plan Review.	No
A0677	B004	Helpful for a similar level of information to be provided in relation to crushed rock as there is for sand and gravel. As a minimum, reference should be included to the minerals technical background report, as well as providing information about non-aggregate minerals (albeit the level of data available is likely to be less detailed).	<p>Noted. For clarity a minor modification is proposed to the proposed explanation of draft Policy SP16 to provide further information in relation to crushed rock and cross-reference the Minerals Technical Background report.</p> <p>It is also proposed that incorrect references to Figure SP16.1 will be corrected as minor modifications in Paragraph 1 of the Policy and paragraph 3.154 of the explanation.</p>	Yes
A0678	B001	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0678	B002	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0678	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0678	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1	No	No	No	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0678	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	No	No	No	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0678	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0678	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0678	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0678	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3	No	No	No	<p>The plan is not effective as there is no evidence that it is deliverable over the plan period - particularly in relation to the planned level of development in the Bridgnorth area. The level of residential development proposed in Bridgnorth far exceeds previous delivery rates. Proposals equate to 92 dwellings per annum as at 31st March 2019 (and there has been little delivery since then, meaning the actual rate required now is higher), whereas the average for the 10-year period to 2016 was some 72.8 dwellings per annum. This means proposals are at least 26% higher than past delivery rate. There is also no evidence that there is market capacity in Bridgnorth to sustainably absorb this level of development, particularly in competition with other settlements.</p> <p>The level of employment development proposed is unclear. Policy S3.1 states 49ha will be made available to "create choice and competition in the market" (this includes 13.3ha net developable on existing allocations, part of which is for the relocation of the livestock market, 11.4ha in the Green Belt adjoining Stanmore Industrial Estate and 16ha within the proposed Tasley Garden Village). However Schedule A6 gives a figure of 37.7ha as the employment land supply for Bridgnorth, this compromises 9.1% of the total supply for Shropshire. Whilst residential proposed consist of only 5.8% of the housing supply for Shropshire. The average completion rate for the 11-year period to 2017 was 0.6ha, the Shropshire Authority Monitoring Report (2017/18) states "It is anticipated that Bridgnorth and Shifnal could both perform stronger roles in the delivery of employment development to meet demands for economic growth arising in part from the rate of housing development in these settlements but this is currently constrained by the limited availability of land for employment development", however no evidence has been provided that Bridgnorth is an attractive location for new employment development and concerned whether this is realistic given weak connectivity.</p> <p>No infrastructure plan has been prepared and a strategic transport assessment for the Bridgnorth area has not yet been carried out/reported. Without these, it cannot be evidenced that local infrastructure is adequate or that necessary improvements can be made/funded through infrastructure contributions to support sustainable delivery of the development proposals.</p> <p>The Shropshire Viability Study suggests that the proposed allocation Tasley Garden Village (BRD030) and Stanmore Garden Village may be viable, however the study notes "the Council is still working up the assessment of the strategic infrastructure and mitigation requirements for these sites" and gives a "best estimate" of infrastructure contributions. As such, consider the evidential value of the Viability Study in supporting the deliverability of these sites is low in the absence of an infrastructure plan and (in particular) a strategic transport assessment for the Bridgnorth area.</p> <p>With regard to proposed employment allocations, the Shropshire Viability Study does not separately assess the viability of employment development at Stanmore or Tasley. In reality, the employment elements of the Tasley and Stanmore Garden Village schemes are part of mixed use allocations, whilst the proposed extension to Stanmore Industrial Estate capitalises on existing on-site infrastructure. The Shropshire Viability Study indicates Office and Industrial development is generally considered unviable and larger industrial development is only marginally viable on greenfield sites. Other forms of development appear to be viable on greenfield and brownfield sites, but these are not proposed on the new employment allocations.</p>
A0678	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Bridgnorth	No	No	No	<p>The draft Shropshire Local Plan has not been justified as an appropriate strategy. It has not been demonstrated that all reasonable alternatives have been considered, and sufficient, proportionate credible evidence has not been provided. Many strategic documents are missing or lacking credible evidence. We therefore consider the plan to be "not sound".</p> <p>No community meetings have occurred during the Regulation 19 and Regulation 18 consultation period.</p> <p>No evidence that representations made during Regulation 18 consultations have been considered.</p> <p>A reasonable alternative to the proposed approach has been presented during the Reg 18 stage of consultation, but no consideration or feedback on this proposal has been provided.</p> <p>Consider that for the Local Plan to be justified as an appropriate strategy, the following is required:</p> <ul style="list-style-type: none"> <li>-A Local Housing Need Assessment for Bridgnorth and justification for the level of housing proposed, without this a decision on the appropriateness of levels of development proposed cannot be reached.</li> <li>-Local Economic Assessment of the Bridgnorth Place Plan Area and justification for the level of employment proposed.</li> <li>-Evidence of the deliverability and viability of the employment land supply (the Shropshire Viability Study does not specifically consider this).</li> <li>-Evidence demonstrating how significant shortfalls in past delivery of jobs, housing and businesses will be addressed.</li> <li>-Justification of the proposed housing requirement (30,800 dwellings) for Shropshire, when the local housing need calculation is some 25,894 dwellings.</li> <li>-Evidence on provision of single occupancy dwellings (sub-national housing projections predict a significant proportion of growth is associated with such households).</li> <li>-Strategic Highway Assessment for Bridgnorth and explanation of how Bridgnorth can be part of the Strategic Transport Corridor.</li> <li>-Infrastructure Plan.</li> <li>-Evidence that sustainable growth, addressing Bridgnorth's low level of employment self-containment would result from planned housing and employment allocations (it is unclear whether past employment completions have kept pace with past housing completions). Existing housing allocations remain to be delivered and there remains a significant shortfall in employment delivery.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0678	B006	<p>Provide evidence of deliverability of the scale of development proposed for Bridgnorth, this should include:</p> <ol style="list-style-type: none"> <li>Evidence of the market capacity to absorb the housing and employment development proposed, which significantly exceeds past rates.</li> <li>Evidence of the ability of local infrastructure across the Bridgnorth area (such as transport and movement) to support the scale of development and prepare an appropriate infrastructure investment plan, with sources of funding clearly identified.</li> <li>Provide a detailed statement of what infrastructure contributions are required from the proposed Garden Village.</li> <li>Re-visit viability calculations for the Garden Village developments, so they clearly include both housing and employment elements and provide a statement of what planning obligations would be expected to ensure delivery of employment alongside policy compliant housing.</li> </ol> <p>Or reduce the scale of development to nearer those historically established levels and review/identify infrastructure (including transport) required to support revised proposals.</p> <p>Identify the actual level of overall new employment development proposed for the Bridgnorth.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Draft Policy S3.1 Development Strategy: Bridgnorth Principal Centre provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.</p> <p>Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements or identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for a site.</p> <p>As part of the Local Plan Review process, Shropshire Council has engaged with key infrastructure providers and prepared/considered evidence on infrastructure capacity and needs as appropriate to inform proposed policies, including development strategies for specific settlements, and proposed allocations.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans.</p> <p>A Strategic Transport Assessment for Bridgnorth is being undertaken to inform infrastructure requirements in association with development proposals for the town, as recognised within the proposed development guidelines for site BRD030 (Tasley Garden Village).</p> <p>The Shropshire Viability Study is based on cautious assumptions regarding infrastructure requirements and contributions associated with potential development sites. However inevitably until the detailed Planning Application stage, the full infrastructure requirements and contributions for a potential development cannot be finalised, as not all necessary information will be available until this stage. Nevertheless, Shropshire Council considers the Shropshire Viability Study is a robust assessment of viability based on the information available at the strategic plan making stage.</p>	No
A0678	B007	<p>Prepare proportionate and credible evidence to justify the proposed strategy and consider all available alternatives.</p> <p>Provide all evidence missing before seeking approval for submission of the draft Shropshire Local Plan.</p> <p>Modify the draft Shropshire Local Plan so that it is consistent with the 1st Edition of the Bridgnorth Plan (appendix to the representation).</p> <p>Reduce the scale of development around Bridgnorth to no more than 1,000 dwellings (including the existing SAMDev Plan allocations), do not identify a single site for development and repeat the Regulation 18 stage to ensure community involvement.</p> <p>Delete sites STC002 and P58a as they represent employment allocations in excess of that needed in Bridgnorth.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, reasons for proposing to exceed this need are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Shropshire Council also considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and national legislation. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Responses.</p> <p>All views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan. A summary of responses to each 'Regulation 18' stage consultation is available on the Shropshire Council website and form appendices of the Consultation Statement prepared for the draft Shropshire Local Plan.</p> <p>Shropshire Council considers that a proportionate and robust evidence base has been prepared to inform the Local Plan Review. This includes such evidence as a Viability Study, Local Housing Need Assessment, Strategic Housing Market Assessment, Place Plans and Strategic Infrastructure Implementation Plan, Economic Development Needs Assessment and Employment Land Review.</p> <p>A Strategic Transport Assessment for Bridgnorth is being undertaken to inform infrastructure requirements in association with development proposals for the town, as recognised within the proposed development guidelines for site BRD030 (Tasley Garden Village).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0678	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	No	<p>Consider neither the 'Gunning Principles' for consultation nor the process require within Shropshire Council's 'Statement of Community Involvement' have been adequately followed.</p> <p>Concern over compliance with 'Gunning Principles' are:</p> <ul style="list-style-type: none"> <li>-There should be sufficient information for intelligent consideration. Do not consider information provided by the promoters of BRD030 was sufficient to allow informed comments and was inaccurate.</li> <li>-There should be adequate time for consideration and response. See above.</li> <li>-'Conscientious consideration' must be given to consultation responses before a decision is reached. No feedback on how submissions have been considered and taken into account has been provided by Shropshire Council.</li> </ul> <p>With regard to the 'Gunning Principles' within the 'Statement of Community Involvement' (SCI):</p> <ul style="list-style-type: none"> <li>-Shropshire Council have not 'engaged in a timely and constructive manner'. There has been a series of consultation exercises, but responses, including from the local community, Parish Councils and Bridgnorth Plan Steering Group have been ignored and no response provided.</li> <li>-The concept of BRD030 (Tasley Garden Village) was only revealed in April 2020, with the promoters undertaking just 1 month's consultation, during the Covid-19 pandemic using a short notice video conference meeting within which many residents were unable to participate, and ending on 3rd June 2020. Shropshire Council then undertook a Regulation 18 Consultation commencing on 3rd August 2020, too short a period for consideration of such a significant change. Too short notice was also provided about proposed changes, and the level of consultation was not proportionate given the scale of proposals and significance of the proposed change. Consider a majority of residents were unaware of proposals.</li> <li>-With regard to 'constructive consultation', the local community have consistently expressed concern that a full infrastructure plan, showing deliverability and funding, is needed for a proposal on this scale and one has not been prepared. Submissions made have not been acknowledged, demonstrating a total lack of constructive consultation.</li> <li>-Shropshire Council have held only one community consultation meeting around Bridgnorth, during the first Regulation 18 Consultation. No meetings have occurred during the second Regulation 18 or Regulation 19 Consultations. Outputs from these meetings have not been considered and neither have surveys undertaken by the Bridgnorth Plan Steering Group.</li> <li>-Shropshire Council has used over-structured methods to receive submissions, to simplify administration, which has reduced lines of consistent argument to isolated comments on individual paragraphs of draft documents.</li> <li>-Methods used to inform and engage communities in the planning process have been totally inadequate.</li> <li>-The SCI requires Shropshire Council to 'provide information on how people's views have been handled, including reporting back to communities ...'. Shropshire Council has provided summaries of submissions to Regulation 18 consultations however this does not begin to meet this commitment.</li> </ul> <p>Additionally questions to Shropshire Council Cabinet on Monday 7th December 2020 were evaded - question and response appended to representation.</p> <p>With regard to legal compliance BRD030 will massively increase vehicle movements and make the town centre more congested and more polluted (already breaching requirements - recent legal decision concluded air pollution contributed to illness/death, Shropshire Council could be held liable under Human Rights legislation if the Draft Shropshire Plan was implemented and the almost certain increase in air pollution was linked to illness and/or death. Manufacture of petrol/diesel vehicles will be banned from 2030, but realistically many millions of such vehicles will be on the road well into the 2030s).</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0678	B008	<p>Modify the draft Shropshire Local Plan in line with the 1st Edition of the Bridgnorth Plan. Reduce the scale of development around Bridgnorth to provide sufficient dwellings to meet the need for a 10-year land bank. Then undertake a new Site Assessment for longer-term needs, giving the opportunity to demonstrate the Statement of Community Involvement has been revisited and its requirements met.</p>	<p>Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Shropshire Council also considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Each stage of consultation has been supported by a proportionate evidence base. Following each of these stages of consultation, a summary of the responses received has been prepared and form appendices to the Consultation Statement prepared for the 'Regulation 19' Pre Submission Draft of the Shropshire Local Plan.</p> <p>With regard to proposed allocation BRD030 (Tasley Garden Village), this site was identified as a proposed allocation and subject to consultation within the 'Regulation 18' Plan Preparation stage of the Local Plan Review - specifically, within the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (August 2020 – September 2020).</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>Where following consultation it has been proposed to make amendments to proposals in response to the consultation process or indeed any other emerging evidence, this has been documented within relevant subsequent consultation documents (reflecting the iterative process undertaken during the Regulation 18 Plan Preparation stage). Furthermore where such changes relate to proposed allocations (which have been the subject of the most significant level of response) this has also been documented within updated site assessments, provided as part of the evidence and consultation material for relevant stages of consultation.</p> <p>A proportionate and robust site assessment process has been undertaken to inform proposed site allocations. This site assessment process undertaken to inform proposed allocations included consideration of public protection.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0678	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	No	<p>The draft Shropshire Local Plan has not been positively prepared, and is therefore not sound, because:</p> <p>-An assessment of local housing need for the Bridgnorth Place Plan Area has not been undertaken. Without this, housing need for Bridgnorth cannot have been objectively assessed. The best assessment of housing need is that undertaken by Bridgnorth District Council in 2006. Extrapolating this to 2036, 15,168 dwellings are needed by 2036, compared with the 16,200 dwellings proposed by the version draft Local Plan at that time. This has been submitted to Shropshire Council in response to Regulation 18 consultation but no feedback has been provided.</p> <p>-'Statements of Common Ground' (SoCG), prepared under the Duty to Cooperate, have not been agreed with other Local Authorities. Paragraph 2.27 of the draft Shropshire Local Plan confirms that discussions have been held but that SoCG will only be available when the plan is submitted for Examination, as such they are not available for consideration as part of the Regulation 19 consultation.</p> <p>Such SoCG would include agreement on the housing needs of adjacent and other local authorities and the extent to which they anticipate not being able to meet them - we understand that not all the other local authorities have completed their own housing needs assessments.</p> <p>Shropshire Council is proposing to contribute 1,500 dwellings to meet the needs of the Association of Black Country Authorities (ABCA). However, we note that none of the members of ABCA are directly neighbouring authorities to Shropshire. It may be more appropriate for Telford and Wrekin Council to contribute to this need (still below the target population of 220,000 and has significant areas of employment land available, also understand they rejected a request from ABCA for support due to lack of evidence).</p> <p>Furthermore, we can find no evidence that any financial contribution has been agreed with these authorities to cover the additional infrastructure costs that will be needed to provide for the additional 1,500 dwellings. Again, without this information we consider that the Local Plan has not been positively prepared or objectively assessed.</p>
A0679	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1 (STC002 and P58a)	No	No	No	<p>Aims of draft Policy SP1 are not supported by or conflict with other policies in the draft Shropshire Local Plan. In particular development of proposed employment allocations STC002 and P58a at Stanmore would not "contribute to meeting local needs" or to "making settlements more sustainable" as required within draft Policy SP1. The settlement at Stanmore is very small and does not require 11.5ha of employment development to meet its needs or to become more sustainable.</p> <p>The Policy is not based on sound evidence and is not justified as being a sound basis for the development of more detailed policies in the draft Shropshire Local Plan. Furthermore exceptional circumstances as required by para 137 of the National Planning Policy Framework (NPPF) have not been done.</p>
A0679	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP10 (STC002 and P58a)	No	No	No	<p>Draft Policy SP10 proposes to restrict economic development in rural areas, in line with national guidance. It says that development proposals in the countryside will be allowed where they maintain or enhance countryside vitality and character. Proposed employment allocations STC002 and P58a at Stanmore are situated in open countryside and accessed through a country park (a situation the Council and local community have sought to protect), there is no guarantee their development will achieve this requirement, so they are proposed for allocation in an attempt to side-step these requirements.</p> <p>There is no reason to allocate sites STC002 and P58, the countryside should continue to be protected.</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0678	B009	<p>Reduce the housing requirement for Shropshire by removing the allocation for the Association of Black Country Authorities (ABCA) under the Duty to Cooperate.</p> <p>Under the Duty to Co-operate approach Telford and Wrekin Council to assess if housing and employment need can be met more sustainably by them.</p> <p>Information already provided by Bridgnorth Plan Steering Group and Save Bridgnorth Green Belt, and others, should be taken into account during the plan-making process.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Responses to Local Plan Review consultations have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No
A0679	B001	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. Draft Policy SP1 is a 'gateway' policy and establishes those issues considered of most importance in supporting Shropshire growth to occur in a sustainable manner. It is considered that this policy is consistent with other policies within the draft Shropshire Local Plan.</p> <p>Sites STC002 and P58a are proposed for allocation to contribute towards achieving the proposed development strategy for Bridgnorth. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p>	No
A0679	B002	<p>Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan.</p> <p>There is no requirement for an alternative site to be identified.</p>	<p>Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP10, rather than draft Policy SP10 itself.</p> <p>Sites STC002 and P58a are proposed for allocation to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. As proposed allocations, draft Policy SP10 would not be applicable.</p> <p>Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0679	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11 (STC002 and P58a)	Not Specified	No	Not Specified	Draft Policy SP11 sets out to protect the Green Belt, in accordance with national policy. National policy is to protect Green Belt from 'inappropriate development'. Para 145 of the National Planning Policy Framework (NPPF) says construction of buildings in the Green Belt is 'inappropriate development', unless they are prescribed uses, which does not include industrial development, such as that proposed at STC002 and P58a. Development of the proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) could not fail to have an adverse effect on the Green Belt, which will continue to surround the proposed allocated sites. Proposed employment allocations STC002 and P58a at Stanmore are located in the Green Belt and no justification, need, indication of which businesses might wish to locate at Stanmore, or exceptional circumstance have been demonstrated. Therefore the proposal appears to be a device to ensure future development proposals at Stanmore are not subject to the limitations imposed by Policy SP11, specifically demonstrating 'very special circumstances'. If these sites are allocated for development, it would be used to justify further incursions into the Green Belt in the future.
A0679	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1	No	No	No	Stanmore and the proposed employment allocations STC002 and P58a at Stanmore are presented as being part of Bridgnorth town and to serve the needs of Bridgnorth. However the Stanmore area is physically separated from Bridgnorth by a steep wooded escarpment, is located in open countryside and does not form a natural extension to Bridgnorth. Draft Policy S3.1 indicates Bridgnorth will deliver 1,800 houses and 49ha of employment land. However Appendix 6 indicates a total supply of 40.5ha for the Place Plan Area and only 37.7ha in Bridgnorth. Clearly there is a discrepancy in the figures, which seems to relate to proposals at Stanmore. These figures do not support proposed allocations STC002 and P58a. The draft Shropshire Local Plan does not explain why it is necessary to allocate 49ha of employment land in Bridgnorth. Draft Policy S3.1 is not properly justified or evidenced, and has not been prepared on the basis of positive and robust predictions of future requirements and take-ups of employment or employment land.
A0679	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Appendix 6 and S3.1 (STC002 and P58a)	No	No	No	Concerned about the note (without details) within Appendix 6 regarding potential for Recycling and Environmental Industries on site in Bridgnorth. Such facilities are unlikely to be provided on a new employment site associated with a garden village (BRD030), so concerned they may be established in a location away from the main urban area – very possibly Stanmore. Proposed allocation STC002 and P58a are proposed for removal from the Green Belt, but would still be surrounded by it and located in the countryside where there is no need for such development and it would be inappropriate for such activities. There is already such an operation not far from Stanmore, towards Worfield (within the Green Belt), which is the source of environmental problems, and an intensification of that use would not be an acceptable situation. Calculation of employment land need for Bridgnorth in the Shropshire Employment Land Review 2019 indicates an "additional provision to address local circumstances" of 12ha is needed, however there is no explanation of how this is calculated. Consider there is no "local circumstance" that would justify this, as evidenced by the current large areas of undeveloped land (some never having been developed), and empty factory units at Stanmore Industrial Estate (in over 40 years since its establishment, existing land and buildings have never been fully developed and put to operational use). As such, additional 11.5ha at STC002 and P58a is not justified or evidenced, and there is no certainty that it can be delivered. The only certainty is it will adversely affect the Green Belt, and act as a precedent for any similar unjustified incursions into the green belt if the future.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0679	B003	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. It is understood comments on soundness relate to compliance of proposed employment allocations STC002 and P58a with draft Policy SP11, rather than draft Policy SP11 itself. The Shropshire Local Plan Review have been informed by a Green Belt Assessment and Review. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Assuming these sites are removed from the Green Belt, draft Policy SP11 would not be applicable. The exceptional circumstances for the proposed release of these sites from the Green Belt are documented within the Green Belt Release Exceptional Circumstances Statement (December 2020) available on the Shropshire Council evidence base page. Very special circumstances would have to be demonstrated as a justification in respect of any future proposals for inappropriate development ( as defined in the NPPF) within Green Belt, with this being a necessary consideration for Planning Applications. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy (including sites STC002 and P58a) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Any decisions on future changes to the extent of Green Belt would be a matter for a future Local Plan Review.	No
A0679	B004	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Draft Policy S3.1 provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.	No
A0679	B005	Proposed employment allocations STC002 and P58a at Stanmore (Bridgnorth) should be deleted from the draft Shropshire Local Plan. There is no requirement for an alternative site to be identified.	Noted. Within the adopted SAMDev Plan (2015), allocation W039 (Land at Old Worcester Road), which is a proposed Saved Allocation within the draft Shropshire Local Plan, has a presumption in favour of the development of recycling and environmental industries. Proposed allocations STC002 and P58a are proposed to be targeted towards the engineering and advanced manufacturing sectors, complement the employment offer on the existing Industrial Estate and contribute towards the objectives of the Shropshire Economic Growth Strategy. Any amenity and other impacts would be a material planning consideration taken into account in decision making in any future Planning Applications. Sites STC002 and P58a are proposed to be removed from the Green Belt and allocated for development to support the role of Stanmore Industrial Estate, contribute towards achieving the proposed development strategy for Bridgnorth and contribute towards the proposed development strategy for Shropshire. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0679	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3	No	No	No	<p>The plan is not effective as there is no evidence that it is deliverable over the plan period - particularly in relation to the planned level of development in the Bridgnorth area. The level of residential development proposed in Bridgnorth far exceeds previous delivery rates. Proposals equate to 92 dwellings per annum as at 31st March 2019 (and there has been little delivery since then, meaning the actual rate required now is higher), whereas the average for the 10-year period to 2016 was some 72.8 dwellings per annum. This means proposals are at least 26% higher than past delivery rate. There is also no evidence that there is market capacity in Bridgnorth to sustainably absorb this level of development, particularly in competition with other settlements.</p> <p>The level of employment development proposed is unclear. Policy S3.1 states 49ha will be made available to "create choice and competition in the market" (this includes 13.3ha net developable on existing allocations, part of which is for the relocation of the livestock market, 11.4ha in the Green Belt adjoining Stanmore Industrial Estate and 16ha within the proposed Tasley Garden Village). However Schedule A6 gives a figure of 37.7ha as the employment land supply for Bridgnorth, this compromises 9.1% of the total supply for Shropshire. Whilst residential proposed consist of only 5.8% of the housing supply for Shropshire. The average completion rate for the 11-year period to 2017 was 0.6ha, the Shropshire Authority Monitoring Report (2017/18) states "It is anticipated that Bridgnorth and Shifnal could both perform stronger roles in the delivery of employment development to meet demands for economic growth arising in part from the rate of housing development in these settlements but this is currently constrained by the limited availability of land for employment development", however no evidence has been provided that Bridgnorth is an attractive location for new employment development and concerned whether this is realistic given weak connectivity.</p> <p>No infrastructure plan has been prepared and a strategic transport assessment for the Bridgnorth area has not yet been carried out/reported. Without these, it cannot be evidenced that local infrastructure is adequate or that necessary improvements can be made/funded through infrastructure contributions to support sustainable delivery of the development proposals.</p> <p>The Shropshire Viability Study suggests that the proposed allocation Tasley Garden Village (BRD030) and Stanmore Garden Village may be viable, however the study notes "the Council is still working up the assessment of the strategic infrastructure and mitigation requirements for these sites" and gives a "best estimate" of infrastructure contributions. As such, consider the evidential value of the Viability Study in supporting the deliverability of these sites is low in the absence of an infrastructure plan and (in particular) a strategic transport assessment for the Bridgnorth area.</p> <p>With regard to proposed employment allocations, the Shropshire Viability Study does not separately assess the viability of employment development at Stanmore or Tasley. In reality, the employment elements of the Tasley and Stanmore Garden Village schemes are part of mixed use allocations, whilst the proposed extension to Stanmore Industrial Estate capitalises on existing on-site infrastructure. The Shropshire Viability Study indicates Office and Industrial development is generally considered unviable and larger industrial development is only marginally viable on greenfield sites. Other forms of development appear to be viable on greenfield and brownfield sites, but these are not proposed on the new employment allocations.</p>
A0679	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Bridgnorth	No	No	No	<p>The draft Shropshire Local Plan has not been justified as an appropriate strategy. It has not been demonstrated that all reasonable alternatives have been considered, and sufficient, proportionate credible evidence has not been provided. Many strategic documents are missing or lacking credible evidence. We therefore consider the plan to be "not sound".</p> <p>No community meetings have occurred during the Regulation 19 and Regulation 18 consultation period.</p> <p>No evidence that representations made during Regulation 18 consultations have been considered.</p> <p>A reasonable alternative to the proposed approach has been presented during the Reg 18 stage of consultation, but no consideration or feedback on this proposal has been provided.</p> <p>Consider that for the Local Plan to be justified as an appropriate strategy, the following is required:</p> <ul style="list-style-type: none"> <li>-A Local Housing Need Assessment for Bridgnorth and justification for the level of housing proposed, without this a decision on the appropriateness of levels of development proposed cannot be reached.</li> <li>-Local Economic Assessment of the Bridgnorth Place Plan Area and justification for the level of employment proposed.</li> <li>-Evidence of the deliverability and viability of the employment land supply (the Shropshire Viability Study does not specifically consider this).</li> <li>-Evidence demonstrating how significant shortfalls in past delivery of jobs, housing and businesses will be addressed.</li> <li>-Justification of the proposed housing requirement (30,800 dwellings) for Shropshire, when the local housing need calculation is some 25,894 dwellings.</li> <li>-Evidence on provision of single occupancy dwellings (sub-national housing projections predict a significant proportion of growth is associated with such households).</li> <li>-Strategic Highway Assessment for Bridgnorth and explanation of how Bridgnorth can be part of the Strategic Transport Corridor.</li> <li>-Infrastructure Plan.</li> <li>-Evidence that sustainable growth, addressing Bridgnorth's low level of employment self-containment would result from planned housing and employment allocations (it is unclear whether past employment completions have kept pace with past housing completions). Existing housing allocations remain to be delivered and there remains a significant shortfall in employment delivery.</li> </ul>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0679	B006	<p>Provide evidence of deliverability of the scale of development proposed for Bridgnorth, this should include:</p> <ol style="list-style-type: none"> <li>1. Evidence of the market capacity to absorb the housing and employment development proposed, which significantly exceeds past rates.</li> <li>2. Evidence of the ability of local infrastructure across the Bridgnorth area (such as transport and movement) to support the scale of development and prepare an appropriate infrastructure investment plan, with sources of funding clearly identified.</li> <li>3. Provide a detailed statement of what infrastructure contributions are required from the proposed Garden Village.</li> <li>4. Re-visit viability calculations for the Garden Village developments, so they clearly include both housing and employment elements and provide a statement of what planning obligations would be expected to ensure delivery of employment alongside policy compliant housing.</li> </ol> <p>Or reduce the scale of development to nearer those historically established levels and review/identify infrastructure (including transport) required to support revised proposals.</p> <p>Identify the actual level of overall new employment development proposed for the Bridgnorth.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Draft Policy S3.1 Development Strategy: Bridgnorth Principal Centre provides a gross figure for employment land proposed to be made available to create choice and competition in the market, this therefore includes land required for landscaping, on-site infrastructure and in the case of existing allocation ELR011b the relocation of the existing livestock market. Schedule A6 presents gross site capacity for proposed allocations, however in the case of Bridgnorth it is net of that land specifically required for landscaping and the relocation of the livestock market.</p> <p>Draft Policy DP25 proposes a policy approach to the provision of infrastructure to ensure that the infrastructure necessary to support development is delivered. Furthermore, where appropriate, proposed site guidelines identify some of the key infrastructure requirements or identify some of the further studies which may need to be undertaken at the Planning Application stage to identify infrastructure requirements, to inform any development proposals for a site.</p> <p>As part of the Local Plan Review process, Shropshire Council has engaged with key infrastructure providers and prepared/considered evidence on infrastructure capacity and needs as appropriate to inform proposed policies, including development strategies for specific settlements, and proposed allocations.</p> <p>The evidence base for the Local Plan Review includes the Place Plans (documents which focus on local infrastructure needs in communities across the County), which are informed by proactive engagement with Town and Parish Council and Strategic Infrastructure Providers. It also includes a Strategic Infrastructure Implementation Plan, which is informed by the Place Plans.</p> <p>A Strategic Transport Assessment for Bridgnorth is being undertaken to inform infrastructure requirements in association with development proposals for the town, as recognised within the proposed development guidelines for site BRD030 (Tasley Garden Village).</p> <p>The Shropshire Viability Study is based on cautious assumptions regarding infrastructure requirements and contributions associated with potential development sites. However inevitably until the detailed Planning Application stage, the full infrastructure requirements and contributions for a potential development cannot be finalised, as not all necessary information will be available until this stage. Nevertheless, Shropshire Council considers the Shropshire Viability Study is a robust assessment of viability based on the information available at the strategic plan making stage.</p>	No
A0679	B007	<p>Prepare proportionate and credible evidence to justify the proposed strategy and consider all available alternatives.</p> <p>Provide all evidence missing before seeking approval for submission of the draft Shropshire Local Plan.</p> <p>Modify the draft Shropshire Local Plan so that it is consistent with the 1st Edition of the Bridgnorth Plan (appendix to the representation).</p> <p>Reduce the scale of development around Bridgnorth to no more than 1,000 dwellings (including the existing SAMDev Plan allocations), do not identify a single site for development and repeat the Regulation 18 stage to ensure community involvement.</p> <p>Delete sites STC002 and P58a as they represent employment allocations in excess of that needed in Bridgnorth.</p>	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, reasons for proposing to exceed this need are documented within the explanation to draft Policy SP2. Strategic Approach.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Shropshire Council also considers the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and national legislation. Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. All parties, including Town and Parish Councils and members of local communities, were able to respond to each of these stages of consultation.</p> <p>Responses.</p> <p>All views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan. A summary of responses to each 'Regulation 18' stage consultation is available on the Shropshire Council website and form appendices of the Consultation Statement prepared for the draft Shropshire Local Plan.</p> <p>Shropshire Council considers that a proportionate and robust evidence base has been prepared to inform the Local Plan Review. This includes such evidence as a Viability Study, Local Housing Need Assessment, Strategic Housing Market Assessment, Place Plans and Strategic Infrastructure Implementation Plan, Economic Development Needs Assessment and Employment Land Review.</p> <p>A Strategic Transport Assessment for Bridgnorth is being undertaken to inform infrastructure requirements in association with development proposals for the town, as recognised within the proposed development guidelines for site BRD030 (Tasley Garden Village).</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0679	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	No	<p>Consider neither the 'Gunning Principles' for consultation nor the process require within Shropshire Council's 'Statement of Community Involvement' have been adequately followed.</p> <p>Concern over compliance with 'Gunning Principles' are:</p> <ul style="list-style-type: none"> <li>-There should be sufficient information for intelligent consideration. Do not consider information provided by the promoters of BRD030 was sufficient to allow informed comments and was inaccurate.</li> <li>-There should be adequate time for consideration and response. See above.</li> <li>-'Conscientious consideration' must be given to consultation responses before a decision is reached. No feedback on how submissions have been considered and taken into account has been provided by Shropshire Council.</li> </ul> <p>With regard to the 'Gunning Principles' within the 'Statement of Community Involvement' (SCI):</p> <ul style="list-style-type: none"> <li>-Shropshire Council have not 'engaged in a timely and constructive manner'. There has been a series of consultation exercises, but responses, including from the local community, Parish Councils and Bridgnorth Plan Steering Group have been ignored and no response provided.</li> <li>-The concept of BRD030 (Tasley Garden Village) was only revealed in April 2020, with the promoters undertaking just 1 month's consultation, during the Covid-19 pandemic using a short notice video conference meeting within which many residents were unable to participate, and ending on 3rd June 2020. Shropshire Council then undertook a Regulation 18 Consultation commencing on 3rd August 2020, too short a period for consideration of such a significant change. Too short notice was also provided about proposed changes, and the level of consultation was not proportionate given the scale of proposals and significance of the proposed change. Consider a majority of residents were unaware of proposals.</li> <li>-With regard to 'constructive consultation', the local community have consistently expressed concern that a full infrastructure plan, showing deliverability and funding, is needed for a proposal on this scale and one has not been prepared. Submissions made have not been acknowledged, demonstrating a total lack of constructive consultation.</li> <li>-Shropshire Council have held only one community consultation meeting around Bridgnorth, during the first Regulation 18 Consultation. No meetings have occurred during the second Regulation 18 or Regulation 19 Consultations. Outputs from these meetings have not been considered and neither have surveys undertaken by the Bridgnorth Plan Steering Group.</li> <li>-Shropshire Council has used over-structured methods to receive submissions, to simplify administration, which has reduced lines of consistent argument to isolated comments on individual paragraphs of draft documents.</li> <li>-Methods used to inform and engage communities in the planning process have been totally inadequate.</li> <li>-The SCI requires Shropshire Council to 'provide information on how people's views have been handled, including reporting back to communities ...'. Shropshire Council has provided summaries of submissions to Regulation 18 consultations however this does not begin to meet this commitment.</li> </ul> <p>Additionally questions to Shropshire Council Cabinet on Monday 7th December 2020 were evaded - question and response appended to representation.</p> <p>With regard to legal compliance BRD030 will massively increase vehicle movements and make the town centre more congested and more polluted (already breaching requirements - recent legal decision concluded air pollution contributed to illness/death, Shropshire Council could be held liable under Human Rights legislation if the Draft Shropshire Plan was implemented and the almost certain increase in air pollution was linked to illness and/or death. Manufacture of petrol/diesel vehicles will be banned from 2030, but realistically many millions of such vehicles will be on the road well into the 2030s).</p>

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0679	B008	<p>Modify the draft Shropshire Local Plan in line with the 1st Edition of the Bridgnorth Plan. Reduce the scale of development around Bridgnorth to provide sufficient dwellings to meet the need for a 10-year land bank. Then undertake a new Site Assessment for longer-term needs, giving the opportunity to demonstrate the Statement of Community Involvement has been revisited and its requirements met.</p>	<p>Noted. Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist. Shropshire Council also considers that the consultation process undertaken to inform the Local Plan Review has been appropriate and complies with the requirements of the current and emerging Statement of Community Involvement and the 'Gunning Principles'.</p> <p>Consultation on the Local Plan Review at the 'Regulation 18' Plan Preparation stage has been an iterative process, with five stages of consultation undertaken, each focussing on a specific set of issues. Each stage of consultation has been supported by a proportionate evidence base. Following each of these stages of consultation, a summary of the responses received has been prepared and form appendices to the Consultation Statement prepared for the 'Regulation 19' Pre Submission Draft of the Shropshire Local Plan.</p> <p>With regard to proposed allocation BRD030 (Tasley Garden Village), this site was identified as a proposed allocation and subject to consultation within the 'Regulation 18' Plan Preparation stage of the Local Plan Review - specifically, within the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (August 2020 – September 2020).</p> <p>Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre-Submission Draft of the Shropshire Local Plan.</p> <p>It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.</p> <p>Where following consultation it has been proposed to make amendments to proposals in response to the consultation process or indeed any other emerging evidence, this has been documented within relevant subsequent consultation documents (reflecting the iterative process undertaken during the Regulation 18 Plan Preparation stage). Furthermore where such changes relate to proposed allocations (which have been the subject of the most significant level of response) this has also been documented within updated site assessments, provided as part of the evidence and consultation material for relevant stages of consultation.</p> <p>A proportionate and robust site assessment process has been undertaken to inform proposed site allocations. This site assessment process undertaken to inform proposed allocations included consideration of public protection.</p>	No

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A0679	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	Whole Document	No	No	No	<p>The draft Shropshire Local Plan has not been positively prepared, and is therefore not sound, because:</p> <p>-An assessment of local housing need for the Bridgnorth Place Plan Area has not been undertaken. Without this, housing need for Bridgnorth cannot have been objectively assessed. The best assessment of housing need is that undertaken by Bridgnorth District Council in 2006. Extrapolating this to 2036, 15,168 dwellings are needed by 2036, compared with the 16,200 dwellings proposed by the version draft Local Plan at that time. This has been submitted to Shropshire Council in response to Regulation 18 consultation but no feedback has been provided.</p> <p>-'Statements of Common Ground' (SoCG), prepared under the Duty to Cooperate, have not been agreed with other Local Authorities. Paragraph 2.27 of the draft Shropshire Local Plan confirms that discussions have been held but that SoCG will only be available when the plan is submitted for Examination, as such they are not available for consideration as part of the Regulation 19 consultation.</p> <p>Such SoCG would include agreement on the housing needs of adjacent and other local authorities and the extent to which they anticipate not being able to meet them - we understand that not all the other local authorities have completed their own housing needs assessments.</p> <p>Shropshire Council is proposing to contribute 1,500 dwellings to meet the needs of the Association of Black Country Authorities (ABCA). However, we note that none of the members of ABCA are directly neighbouring authorities to Shropshire. It may be more appropriate for Telford and Wrekin Council to contribute to this need (still below the target population of 220,000 and has significant areas of employment land available, also understand they rejected a request from ABCA for support due to lack of evidence). Furthermore, we can find no evidence that any financial contribution has been agreed with these authorities to cover the additional infrastructure costs that will be needed to provide for the additional 1,500 dwellings. Again, without this information we consider that the Local Plan has not been positively prepared or objectively assessed.</p>
A0680	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1	Not Specified	Not Specified	Not Specified	<p>Oppose proposed allocation of Tasley Garden Village (BRD030) rather than Stanmore Garden Village, as:</p> <ol style="list-style-type: none"> <li>Existing SAMDev Plan allocations already provide 500 dwellings in Tasley and relocation of the livestock market south of Shrewsbury Road.</li> <li>All of Stanmore Garden Village is in the ownership/has agreement with a developer, as opposed to Tasley Garden Village.</li> <li>Inescapable that large numbers commute from Bridgnorth to Birmingham/Black Country. New homes on the east of the town would aid in calming traffic in an already congested Bridgnorth.</li> <li>During previous consultation events, it was stated that development to the east of Bridgnorth was preferable to development to the west of Bridgnorth, due to repeated development in this location, which risked causing sprawl.</li> <li>Developers of Stanmore Garden Village have committed to a 0 carbon policy. Recognise this could be reciprocated at Tasley Garden Village but pertinent they have not yet.</li> <li>Concerned about potential conflict between housing on Tasley Garden Village and mineral deposits beneath Morville Heath.</li> <li>Consider approving a Plan without traffic survey work being completed would mean passing judgement without adequate information.</li> <li>Cannot ignore opposition from all the levels of local democracy: parish/town/unitary/parliamentary.</li> </ol> <p>Consider best means for providing housing is through release of Green Belt land at Stanmore Garden Village alongside saved SAMDev Plan allocations at Tasley (provides housing and allows for the relocation of the cattle market).</p>
A0681	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S3.1	Not Specified	Not Specified	Not Specified	<p>Oppose proposed allocation of Tasley Garden Village (BRD030) rather than Stanmore Garden Village, as:</p> <ol style="list-style-type: none"> <li>Existing SAMDev Plan allocations already provide 500 dwellings in Tasley and relocation of the livestock market south of Shrewsbury Road.</li> <li>All of Stanmore Garden Village is in the ownership/has agreement with a developer, as opposed to Tasley Garden Village.</li> <li>Inescapable that large numbers commute from Bridgnorth to Birmingham/Black Country. New homes on the east of the town would aid in calming traffic in an already congested Bridgnorth.</li> <li>During previous consultation events, it was stated that development to the east of Bridgnorth was preferable to development to the west of Bridgnorth, due to repeated development in this location, which risked causing sprawl.</li> <li>Developers of Stanmore Garden Village have committed to a 0 carbon policy. Recognise this could be reciprocated at Tasley Garden Village but pertinent they have not yet.</li> <li>Concerned about potential conflict between housing on Tasley Garden Village and mineral deposits beneath Morville Heath.</li> <li>Consider approving a Plan without traffic survey work being completed would mean passing judgement without adequate information.</li> <li>Cannot ignore opposition from all the levels of local democracy: parish/town/unitary/parliamentary.</li> </ol> <p>Consider best means for providing housing is through release of Green Belt land at Stanmore Garden Village alongside saved SAMDev Plan allocations at Tasley (provides housing and allows for the relocation of the cattle market).</p>



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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0679	B009	Reduce the housing requirement for Shropshire by removing the allocation for the Association of Black Country Authorities (ABCA) under the Duty to Cooperate. Under the Duty to Co-operate approach Telford and Wrekin Council to assess if housing and employment need can be met more sustainably by them. Information already provided by Bridgnorth Plan Steering Group and Save Bridgnorth Green Belt, and others, should be taken into account during the plan-making process.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Once a Local Housing Need assessment for the Local Authority has been undertaken, it is the responsibility of the Local Authority to determine an appropriate and sustainable strategy for the level and distribution of development.</p> <p>There is no specific requirement to undertake a Local Housing Need assessment at a sub-Local Authority level, however through the Shropshire Council-led 'Right Home Right Place' initiative, we are seeking to help identify housing needs in the communities across Shropshire and draft Policy DP1 proposes that these surveys will inform the types of houses delivered within communities.</p> <p>With regard to the proposed contribution to the cross-boundary need arising within the Black Country, Shropshire Council currently understands that evidence prepared to inform the ongoing Black Country Local Plan Review indicates a significant unmet housing and employment land need within the Black Country. As a result of Duty to Cooperate discussions, Shropshire Council is proposing to contribute 1,500 dwellings and 30ha of employment land towards meeting this unmet housing and employment land needs.</p> <p>Shropshire Council also considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Responses to Local Plan Review consultations have been given due consideration. It is recognised that there will sometimes be local opposition to Local Plan proposals. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of consultation, which have not led to subsequent changes, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy.</p>	No
A0680	B001	Remove proposed allocation Tasley Garden Village (BRD030) and instead include Stanmore Garden Village.	<p>Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process.</p>	No
A0681	B001	Remove proposed allocation Tasley Garden Village (BRD030) and instead include Stanmore Garden Village.	<p>Shropshire Council considers that the proposed development strategy for Bridgnorth and the existing commitments (including existing allocations), proposed allocations and proposed windfall allowance identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). This proposed development strategy has given due consideration to the settlements characteristics, constraints and opportunities that exist.</p> <p>Proposed allocations within the draft Shropshire Local Plan have been informed by a proportionate and robust site assessment process.</p>	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0682	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP1	Not Specified	Not Specified	Not Specified	Consider paras 2-6 of draft Policy DP1 should acknowledge the final housing mix of any development will be subject to further negotiation between the applicant and Council during the Planning Application process. This approach is justified in that demography and market signals will change over the plan period to 2038 and consistent with para 122b of the National Planning Policy Framework (NPPF). Detailed prescription should be avoided in order to not undermine market demand and financial viability, which can put delivery at great risk.
A0682	B002	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP2	Not Specified	Not Specified	Not Specified	Consider a key consideration in relation the self/custom-build is whether providing such homes in large scale new build developments meets needs and aspirations of registered self/custom-builders. To avoid self/custom-build plots being left undeveloped, a mechanism should included to enable plots to be delivered by the developer if a self/custom-builder is not found after a certain period. Phasing and legal agreements will have to ensure provision of 10% of homes on a development for self/custom-build does not have an impact on the delivery and occupation of the wider development.
A0682	B003	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP3	Not Specified	Not Specified	Not Specified	Consider the terminology in para 1b of draft Policy DP3 regarding off-site provision of affordable housing is not in accordance with para 62 of the National Planning Policy Framework (NPPF). Specifically, para 62 of the NPPF states affordable housing can be provided off-site or an appropriate financial contribution paid in-lieu if it can be robustly justified. As such it does not specify "exceptional circumstances" for off-site provision or an appropriate financial contribution in lieu.
A0682	B004	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP11	Not Specified	Not Specified	Not Specified	Consider draft Policy DP11 is not required as the Council's ambitions to minimise Carbon Emissions are set out in draft Policy SP3 and any new homes will have to be in compliance with the proposed changes to Building Regulations within the Future Homes Standard. This policy should therefore be deleted.
A0682	B005	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	DP28	Not Specified	Not Specified	Not Specified	Consider Land between Park Lane and the A464 meets the requirements of draft Policy DP28. This site is in a highly sustainable location and benefits from good access to existing public transport and offers opportunities for active travel. Shifnal is an inherently sustainable location (as recognised within the assessment of services/facilities in the Hierarchy of Settlements Assessment undertaken to inform the draft Shropshire Local Plan) which we consider should receive a higher level of housing growth within the plan period, and that the safeguarded sites identified around Shifnal, should not be safeguarded but allocated for delivery within the plan period.
A0682	B006	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S15	Not Specified	Not Specified	Not Specified	Shifnal is considered an inherently sustainable location (one of the most sustainable settlements in Shropshire), on the M54 growth corridor, subject to significant market demand and well-related to Birmingham/Black Country (with unmet need) and provides an opportunity to delivery housing and employment in parallel (rather than risking employment delivery commencing as housing tails off). As such, it should receive a higher level of residential growth. Additional growth in Shifnal will support aspirations for growth corridors. Consider land proposed to be safeguarded for future development (particularly Land between Park Lane and the A464) should instead be allocated for development. If they remain as safeguarded land, a mechanism should be included that allows for them to come forward during the proposed Plan period if the need arises. Land between Park Lane and the A464, which is identified as proposed safeguarded land (currently within the Green Belt), is the right location for growth in a Shifnal context and comprehensively aligns with aspirations of the draft Shropshire Local Plan. It is deliverable during the proposed Plan period and has the potential to accommodate 175-200 dwellings; is owned/controlled by a single landowner/developer; is in close proximity of a range of services and facilities; is not subject to any overriding environmental or physical constraints; and access could be secured off both the A464 and Park Lane. A vision framework/illustrative masterplan (Appendix to this representation) has been prepared for the site (informed by extensive supporting assessments including a Landscape Visual Assessment, Transport Note, Flood Risk Assessment, Preliminary Ecological Appraisal and Initial Heritage Assessment which also form Appendices to this representation), demonstrating consideration of opportunities/constraints, how the site could be delivered and how it can contribute to a sense of place for Shifnal and wider growth within this part of Shropshire. Have also committed to preparing a holistic masterplan (with adjoining landowners of land also proposed as safeguarded land) for delivering development to the south and west of Shifnal. A vision framework/illustrative masterplan (appended to this representation) which demonstrates opportunity for comprehensive delivery, although Land between Park Lane and the A464 can come forward independently. Previous consultation responses on this site have been considered an clarification on issues raised is provided as an appendix to this representation. It would be beneficial to give safeguarded land site references.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0682	B001	Amend draft Policy DP1 so that paras 2-6 acknowledge that the final housing mix is subject to negotiation at the Planning Application stage.	Noted. Shropshire Council considers the proposed requirements of draft Policy DP1 positively respond to the housing need evidence within the Strategic Housing Market Assessment (SHMA), which is considered a robust and proportionate evidence base for informing policies on housing need. It is also considered that the proposed policy requirements within draft Policy DP1 provide an appropriate balance between ensuring new development includes an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) and also allowing flexibility for innovation within development.	No
A0682	B002	Consider whether self/custom-build plots on large developments meet need. Include a mechanism for self/custom-build plots to revert to the developer if not taken up. Require phasing/legal agreements to ensure self/custom build plots do not have an adverse impact on delivery/occupation of the wider development.	Noted. Shropshire Council as one of the Self-Build Vanguard Authorities, promotes the provision of appropriately located individual and group Self-Build and Custom-Build dwellings. It is considered that the proposed approach within draft Policy DP2, alongside other relevant policies relating to residential development in the draft Shropshire Local Plan, will effectively meet the diverse need for self-build and custom-build development. Draft Policy DP2 includes appropriate timescales for marketing of self/custom-build plots and the phasing of these plots within a development.	No
A0682	B003	Remove reference to demonstrating exceptional circumstances where off-site affordable housing or financial contributions are provided in lieu of on-site affordable housing provision.	Shropshire Council considers that the proposed terminology in para 1b of draft Policy DP3 is appropriate and consistent with national policy. The preference locally and nationally is for on-site provision of affordable housing in order to create sustainable and vibrant communities, furthermore in a Shropshire context there is a significant need for affordable housing and on-site provision allows earliest delivery of these much needed dwellings. An updated Type and Affordability of Housing Supplementary Planning Document (SPD) will define the relevant exceptional circumstances which will represent robust justification for off-site affordable housing or a financial contribution. It will also define the methodology for calculating financial contributions in lieu of on-site affordable housing in circumstances where relevant exceptional circumstances are justified.	No
A0682	B004	Delete this policy.	Shropshire Council considers that draft Policy SP3 and draft Policy DP11 are complementary. Subsection 1 (a) of the 2008 Planning and Energy Act states that Local Authorities may include policies imposing reasonable requirements for 'a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development' provided these are consistent with national policy. National policy is the 2015 Written Ministerial Statement which allows Local Planning Authorities to set Code for Sustainable Homes level 4 energy standards. Shropshire Council considers the proposed site guideline for on-site renewable and low-carbon energy generation to be consistent with the proposed requirement in draft Policy DP11, and for this draft policy to be reasonable. This requirement in draft Policy DP11 has been subject to due consideration within the Viability Assessment undertaken to inform the draft Shropshire Local Plan.	No
A0682	B005	Identify a higher housing guideline than that proposed for Shifnal. Land proposed to be safeguarded for future development should instead be allocated for development.	Shropshire Council considers that the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).	No
A0682	B006	Identify a higher housing guideline than that proposed for Shifnal. Land proposed to be safeguarded for future development should instead be allocated for development. If these sites remain as safeguarded land, a mechanism should be included that allows for them to come forward during the proposed Plan period, if the need arises.	Noted. Shropshire Council considers that the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)). Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. With regard to the proposed safeguarded land, it is noted that the National Planning Policy Framework (NPPF) states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development". The explanation to draft Policy SP2 outlines potential responses where any issues with the supply or delivery of new dwellings arises, which include such measures as preparation of a Housing Delivery Action Plan or Local Plan Review. With regard to the proposed safeguarded land, it is noted that the National Planning Policy Framework (NPPF) states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development". It is not considered necessary to provide site references for proposed safeguarded land. Consistent with the NPPF, such land can only come forward for development following an update to a plan which proposes its development.	No

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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0682	B007	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP1	Not Specified	Not Specified	Not Specified	Land between Park Lane and the A464, which is identified as proposed safeguarded land, aligns with the guiding principles set out in draft Policy SP1, as: -It is in a highly sustainable location with good access to services and facilities and all necessary infrastructure can be delivered (informed by vision framework appended to this representation). It also adjoins and can integrate into the existing built form/community, draw new households into the settlement increasing vitality and viability of services/facilities. -It can deliver 175-200 dwellings consisting of appropriate mix of housing, including policy compliant affordable housing, to meet need. -It will achieve high-quality design, including sufficient water attenuation can be provided to address climate change and a strong landscape framework including open space. -Its development will boost the local economy.
A0682	B008	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP2	Not Specified	Not Specified	Not Specified	Support ambition for Shropshire to flourish as identified in draft Policy SP2. Recognise the sustained ambition of Shropshire Council to propose a housing requirement which exceeds local housing need, as calculated using Governments standard method. This recognises economic aspirations for the M54 corridor, will deliver more much needed affordable housing (historically under-delivered) and is supported within the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). However, up to date demographic projections suggest a higher level of need than that calculated using Governments standard methodology. Planning for higher levels of housing need is also prudent given significant pressures in the Greater Birmingham/Black Country Housing Market Area (little evidence needs will be met), which has strong relationships to both Shropshire and Shifnal. This will be exacerbated by recent changes to Governments standard methodology which include a 35% uplift in both Birmingham and Wolverhampton, resulting in continued pressure to displace housing demand pressures (including in Shropshire). Opportunity exists to take an even more positive approach in providing for these needs, given the unique position of adjoining housing markets linked by the M54 Corridor. Planning for housing above the proposed housing requirement would further support the delivery of additional affordable housing towards identified needs and mitigate risk that the aspired boost in provision is not achieved. Note proposed approach to keeping availability of land under review, but there is no mechanism to determine how these reviews could impact on proposed policies/how safeguarded land could be considered for development. Such a mechanism would make the plan more robust and ensure ambitions are achieved. Shifnal is identified as a Key Centre and is a sustainable location for development. This is supported by the Hierarchy of Settlements Assessment (HoS) which reviews services/facilities and indicates significant provision of social infrastructure. This provision is also recognised in the Sustainability Appraisal (SA) of the draft Shropshire Local Plan and aligns with the objective to provide health and leisure/recreation facilities in the Shifnal Neighbourhood Plan. Strong evidence of proposed approach to allocating/safeguarding land for housing in Shifnal. Strongly support provision of a large employment site in Shifnal, as a means of sustainably accommodating inward investment, enabling local business to grow and build on advantages of the M54 corridor (regionally and nationally significant growth corridor). However, realistic prospect that housing delivery will be curtailed by the proposed housing requirement in parallel with delivery of this employment allocation. Some displacement of people living in Shifnal but working elsewhere could occur, but enhancement in provision of rail transport services, alongside other factors, is likely to make it challenging to realise this quickly. Creation of jobs will elevate demand for housing, therefore to fully realise opportunities associated with the M54 corridor, greater flexibility regarding advancement of safeguarded land within the proposed Plan period should be provided.
A0682	B009	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP3	Not Specified	Not Specified	Not Specified	Support overall goal of making Shropshire Council net greenhouse neutral by 2030, as set out in the Climate Change Strategy Framework. Consider more growth at Shifnal will assist in endeavours to transition to a zero carbon economy, and would avoid the need for development to be brought forward in less sustainable locations elsewhere. Land between Park Lane and the A464 at Shifnal is just such a sustainable location, with good access to services and facilities. The potential design for this site (set out in technical survey reports which form appendices to this representation) can contribute to reducing carbon emissions and mitigating/adapting to climate change.
A0682	B010	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP4	Not Specified	Not Specified	Not Specified	Draft Policy SP4 duplicates the National Planning Policy Framework (NPPF) and reiterates principles in S38(6) of the Planning and Compulsory Purchase Act. Consider draft Policy SP4 would be more effective if further details were provided relating to how the presumption will be applied locally.
A0682	B011	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP5	Not Specified	Not Specified	Not Specified	Promoter of Land between Park Lane and the A464 at Shifnal has a track record of high quality design. The Vision Framework and Illustrative Masterplan for land west of Shifnal (appended to representation) demonstrate how wider design considerations have been considered.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0682	B007	N/A	Noted.	No
A0682	B008	Increase the proposed housing requirement. Include a mechanism which allows easing of policies/bringing forward of safeguarded land where required to supplement supply/realise benefits on the M54 corridor.	<p>Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>Government has recently consulted upon potential changes to the methodology for calculating LHN, including the potential use of the 2018-based sub-national household projections (SNHP). As a result of this consultation Government determined that it was most appropriate to retain the use of the 2014-based SNHP for this calculation. Furthermore, in responding to this Consultation, Shropshire Council indicated its significant concerns regarding the 2018-based SNHP, particularly with regard to their reliance on the 2018-based sub-national population projections (SNPP) which utilised only 2-years of internal migration data in their formulation.</p> <p>Shropshire Council also considers that the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>In identifying proposed site allocations a comprehensive site assessment process has been undertaken, which included consideration of whether the site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt.</p> <p>Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development.</p> <p>Where land is ultimately proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement available on the Shropshire Council Evidence Base page.</p> <p>With regard to the proposed safeguarded land, it is noted that the National Planning Policy Framework (NPPF) states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development".</p> <p>The explanation to draft Policy SP2 outlines potential responses where any issues with the supply or delivery of new dwellings arises, which include such measures as preparation of a Housing Delivery Action Plan or Local Plan Review. With regard to the proposed safeguarded land, it is noted that the National Planning Policy Framework (NPPF) states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development".</p>	No
A0682	B009	Identify a higher housing guideline than that proposed for Shifnal. Land proposed to be safeguarded for future development should instead be allocated for development. If these sites remain as safeguarded land, a mechanism should be included that allows for them to come forward during the proposed Plan period, if the need arises.	<p>Noted. Shropshire Council considers that the proposed development strategy for Shifnal and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p> <p>Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.</p> <p>With regard to the proposed safeguarded land, it is noted that the National Planning Policy Framework (NPPF) states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development".</p>	No
A0682	B010	Provide further details relating to how the presumption in favour of sustainable development would be applied locally.	Noted. Shropshire Council considers draft Policy SP4 is appropriate and consistent with national policy. It is complemented by the wider draft Policies within the draft Shropshire Local Plan.	No
A0682	B011	N/A	Noted.	No



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Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0682	B012	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP7	Not Specified	Not Specified	Not Specified	Draft Policy SP7 makes no reference to proposed safeguarded land. Para 4 of the Policy references circumstances where land beyond development boundaries will be considered potentially acceptable. Consider it would be sensible to consider safeguarded land in the first instance (particularly as Shifnal is a very sustainable settlement with good access to services and facilities). As such a robust mechanism should be built into draft Policy SP7 to allow safeguarded sites (Land between Park Lane and the A464 is sustainably located and suitable for residential development - the vision framework (appended to this representation) demonstrates consideration of constraints and opportunities) to be brought forward at an earlier date if certain criterion is met.
A0682	B013	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP11	Not Specified	Not Specified	Not Specified	Welcome upgrade of draft Policy SP11 to a 'strategic' one. Only reference to safeguarded land is specifying identified land is to be removed from the Green Belt. Contend the approach to safeguarded sites is not consistent with para 120 of the National Planning Policy Framework (NPPF), which states policies need to reflect changes in demand for land. There is an opportunity to make draft Policy SP11 more robust and assist in ensuring its soundness by including a mechanism for when the safeguarded land could come forward within the proposed Plan period. Consideration of all other reasonable options and exceptional circumstances for Land between Park Lane and the A464 have been fully evidenced and justified through Shropshire's evidence base (including the Green Belt Release Exceptional Circumstances Statement), in line with para 136 of the NPPF. This evidence justifies allocation rather than safeguarding of this site. However, if it remains safeguarded land the above mechanism is important to allow it to come forward for development. It would be beneficial to give safeguarded land site references.
A0682	B014	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	SP14	Not Specified	Not Specified	Not Specified	Welcome upgrade of draft Policy SP14 to a 'strategic' one. Support purpose of this draft policy to enable Shropshire to respond positively to demand from new businesses and note recognition that such inward investment needs to be supported by delivery of housing. Proposed large employment allocation in Shifnal is strongly supported as a means of sustainably accommodating inward investment, enabling local business to grow, providing an opportunity to balance housing and employment, and using advantages of the M54 corridor. However, realistic prospect that housing delivery will be curtailed by the proposed housing requirement in parallel with delivery of this employment allocation. Some displacement of people living in Shifnal but working elsewhere could occur, but enhancement in provision of rail transport services, alongside other factors, is likely to make it challenging to realise this quickly. Creation of jobs will elevate demand for housing, therefore to fully realise opportunities associated with the M54 corridor, greater flexibility regarding advancement of safeguarded land within the proposed Plan period should be provided. Shifnal's location on the M54/A5 East growth corridor, and the strong connectivity benefits this creates (enhanced by recent improvements to rail services part stimulated by development), are important factors in current/future demand. Land between Park Lane and the A464 is sustainably located with good access to services and facilities and is suitable for 175-200 dwellings, it can assist in accommodating sustainable growth of Shifnal as part of a Strategic Corridor. The vision framework (appended to this representation) demonstrates consideration of constraints and opportunities and deliverability of the site.

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Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)
A0682	B012	Include a mechanism in draft Policy SP7 which allows safeguarded sites to be bought forward at an earlier date if certain criterion is met.	<p>Shropshire Council consider that draft Policy SP7 provides an appropriate mechanism for responding to circumstances where there is clear evidence that the residential development guideline for the settlement appears unlikely to be met over the plan period, or where there are specific considerations set out in the Settlement Policies.</p> <p>Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.</p> <p>With regard to the proposed safeguarded land, it is noted that the National Planning Policy Framework (NPPF) states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development".</p>	No
A0682	B013	<p>Include a mechanism in draft Policy SP11 which allows safeguarded sites to be bought forward at an earlier date if certain criterion is met.</p> <p>Land proposed to be safeguarded for future development should instead be allocated for development.</p> <p>Provide references for proposed safeguarded land.</p>	<p>Shropshire Council consider that draft Policy SP11 is appropriate and consistent with the National Planning Policy Framework (NPPF).</p> <p>Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.</p> <p>With regard to the proposed safeguarded land, it is noted that the NPPF states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development".</p> <p>It is not considered necessary to provide site references for proposed safeguarded land. Consistent with the NPPF, such land can only come forward for development following an update to a plan which proposes its development.</p>	No
A0682	B014	<p>Land proposed to be safeguarded for future development should instead be allocated for development.</p> <p>If these sites remain as safeguarded land, a mechanism should be included that allows for them to come forward during the proposed Plan period, if the need arises.</p>	<p>Shropshire Council has undertaken a robust and proportionate site assessment process to inform identification of proposed allocations and proposed safeguarded land. This was informed by a robust Green Belt Review. A summary of this assessment, including an explanation of why proposed allocations and proposed safeguarded land have been identified for development is provided as an appendix to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.</p> <p>With regard to the proposed safeguarded land, it is noted that the NPPF states Plans should "make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development".</p>	No

# **Shropshire Local Plan Review**

## **Schedule 3: Respondents Details**

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0001	Mr	A	McConnachie					
A0002	Mr	Andrew	Plastow					
A0003	Mrs	Helen	Plastow					
A0004	Mr	Bernie	Jones	Shrewsbury & Newport Canals Trust				
A0005	Mr	Anthony	Jones					
A0006	Mrs	Lesley	Durbin					
A0007	Mr Mrs	Paul Jackie	Arnold Ingham	Longden Village Action Group (LVAG)				
A0008	Mr	David	Thompson	Boningdale Homes Ltd		Mark	Cullen	Alder King Planning Consultants
A0009				JR Planning & Development		Matt	Tompkins	TT Planning
A0010	Mr	Brian	Tevendale					
A0011	Mrs	Caia	Bryant-Griffiths					
A0012		Mark	Peake					
A0013		Susan	Peake					
A0014		Joseph	Phillips	Shropshire Wildlife Trust				
A0015	Mrs	Anna	McCann					
A0016	Mr	Dewi	Griffiths	Welsh Water				
A0017		Edward	Davies	St Martins Parish				
A0018	Mr	Oliver	Eaton		Mr	David	Fletcher	DWF PLANNING SERVICES
A0019		Graham	Bould	Grinshill Parish Council				
A0020	Mr	Colin	Muller	Muller Property Group	Mr	John	Pearce	Harris Lamb
A0021	Mrs	MA	Westrop					
A0022	Dr	James	Ballantyne					
A0023		JR	Lawrence					

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0024	Mr	Simon	Knight					
A0025	Mr & Mrs	Brian & Anna	Sidoli-Morris					
A0026	Ms	Marian	Giles	Kinnerley Parish Council				
A0027	Mr	Steve	Constable		Mrs	Helen	Howie	Berrys
A0028		Trudi	Barrett	Much Wenlock Town Council				
A0029		Helen	Ball	Shrewsbury Town Council				
A0030	Mr	Lionel	Llewellyn					
A0031	Mrs	Katherine	Foster					
A0032		Stephen	Carroll					
A0033	Mr	Timothy	Morris					
A0034	Dr	C Jeremy	Roberts					
A0035	Mr	Brian	Wilson					
A0036				Mercian Development LTD & Diageo Pension Trust	Mr	Paul	Newton	Barton Willmore LLP
A0037	Mr	Clive	Benfield	Fletcher Homes	Mrs	Helen	Howie	Berrys
A0038	Mr & Mrs	John and Fenella	Davies		Mrs	Helen	Howie	Berrys
A0039	Mr & Mrs	G & I	Redge		Mrs	Helen	Howie	Berrys
A0040		Mrs S. Evans and Mrs D. Phillips			Mrs	Helen	Howie	Berrys
A0041	Mr	Colin	Muller	Muller Property Group	Mrs	Helen	Howie	Berrys
A0042		Mr A. & Mrs J.	Maiden		Mrs	Helen	Howie	Berrys
A0043	Mr	Andrew	Brazier	The Fletcher Sundorne Partnership	Mrs	Helen	Howie	Berrys



Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0044	Mr & Mrs	David & Helen	Barber					
A0045	Mr	Paul	Arnold		-			
A0046	Mr	Paul	Mayoh	Longden Village Action Group				
A0047	Mrs	Louise	Mayoh	Longden Village Action Group				
A0048	Mrs	Josephine	Fotheringham	Longden Village Action Group				
A0049	Mr	Andrew	Cristinacce					
A0050	Mrs	Dorothy	Groombridge	Longden Village Action Group				
A0051	Mr	John M	Groombridge	Longden Village Action Group				
A0052	Mr	John R	Groombridge	Longden Village Action Group				
A0053	Ms	Helen	Beevers					
A0054	Mr	Roger	Ford					
A0055	Mr	Richard	Clowes					
A0056	Mrs	Jayne	Leeke					
A0057	Mrs	Susan	Loader	Longden Village Action Group				
A0058	Mr	John	Loader	Longden Village Action Group				
A0059	Mr	Cedric	Hill					
A0060	Mrs	Marilyn	Silver	Tong Parish Council				
A0061	Mr	Paul	Bethell	Unknown				
A0062	Mrs	Selina	Graham	Willey Estates				
A0063	Mrs	Susan	Farmer					
A0064	Mr	Neal	Boniface					
A0065	Mr	James	Thelwell					
A0066	Mr	Bryan	Daniel					

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0067	Miss	Alison	Childs					
A0068	Mr	Steven	Alvis					
A0069	Mrs	Jean	Roberts					
A0070	Dr	Pam	Yuille					
A0071	Mr	Lee	Jakeman	Bridgnorth town Council				
A0072		Arren	Roberts	Oswestry Town Council				
A0073				The Strategic Land Group Ltd	Mr	John	Coxon	Emery Planning
A0074	Mrs	Mary	Steer	Shropshire Geological Society				
A0075		John	Simpson					
A0076		Dugdale, Inglis, & Orr	Main		Mr	Andrew	Russell-Wilks	Godfery-Payton
A0077	Mr	Adam	Davies	Longden Village Action Group				
A0078	Mr	Howard	Thorne	Shropshire Homes Ltd				
A0079	Mr	Roger	Carlyle					
A0080	Mrs	Edith	Alvis					
A0081	Mr	Peter	Walters					
A0082	Mrs	Valerie	Walters					
A0083	Mrs	Nieves	Bruce					
A0084	Mr	Richard	Downes					
A0085	Mrs	Pat	Bailey					
A0086	Mr	Roger	Hunt		Mr	Andy	Williams	Advance Land & Planning Ltd
A0087		Jackie	Brit					
A0088	Mrs	Lesley	Durbin	Much Wenlock Neighbourhood Plan Refresh Group				

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0089	Mr	Stuart	Ashton	Harworth Group plc	Mr	Steve	Lewis-Roberts	Pegasus Group
A0090	Mr	David	Ward	Oswestry and District Civic Society				
A0091	Ms	Nicola	Squire					
A0092	Mrs	Helen	Payne					
A0093	Mr	Anthony	Pitchers					
A0094	Mrs	Hayley	Deighton					
A0095	Mr	Nigel	Ingham	Longden Village Action Group				
A0096	Ms	Helen	Hill					
A0097	Mrs	Caroline	Higgins	Longden Parish Council				
A0098	Mr	Hugh	Trevor-Jones					
A0099	Mrs	Penny	O'Hagan	Wem Town Council				
A0100	Ms	Derwena	Evans					
A0101		Helen	Checketts	Wyre Forest District Council				
A0102		Rob	Chamley	Cheshire West & Chester Council				
A0103	Mr	Mike	Evans		Mr	Les	Stephan	Les Stephan Planning Ltd
A0104	Mrs	Dorothy	Jones		Mr	Les	Stephan	Les Stephan Planning Ltd
A0105	Mr	Tony	Rickards	G.C.Rickards Ltd	Mr	Les	Stephan	Les Stephan Planning Ltd
A0106	Mr	Matt	Wason	Elson Land Ltd	Mr	Les	Stephan	Les Stephan Planning Ltd
A0107		Stephanie Leach & Stella Crank		Agent:Les Stephan	Mr	Les	Stephan	Les Stephan Planning Ltd
A0108				Hollyhead Estates Ltd (Bicton & Ford)	Mr	Les	Stephan	Les Stephan Planning Ltd

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0109		Gill	Tranter		Mr	Les	Stephan	Les Stephan Planning Ltd
A0110	Mr	John	Williams		Mr	Les	Stephan	Les Stephan Planning Ltd
A0111	Mrs	Debbie	Marais	Pontesbury Parish Council				
A0112	Mr	Stephen	McDermott					
A0113				West Mercia Police	Miss	Emily	Kingswell	Place Partnership Limited
A0114	Mrs	Louisa	Kennedy					
A0115	Mr	Thomas	Kennedy					
A0116	Mrs	Ann	Hudson					
A0117	Mr	Christopher	Hudson					
A0118	Mr	Reuben	Bellamy	Lone Star Land	Mrs	Hannah	Price	Fisher German Ltd
A0119	Mrs	Jenny	Alderson					
A0120	Mr	Keith	Alderson					
A0121	Mr	David	Rawlinson	Alveley & Romsley PC				
A0122	Mr	Peter	Day					
A0123	Mr	Edward	Goddard	Paterson Enterprises	Mrs	Rebecca	Booth	Leith Planning Ltd
A0124	Mr	Stuart	Morgans	Sport England				
A0125	Mr	Stuart	Thomas					
A0126	Mrs	Sarah-Jane	Smith	Worthen with Shelve Parish Council				
A0127	Mrs	Victoria	Gemmell					
A0128	Miss	Lydia	Bardsley	Clive Parish Council				
A0129				Gleeson Strategic Land Ltd	Mrs	Debbie	Farrington	Cerda planning Ltd
A0130	Mr	Steve	Atkinson		Mr	Sean	McGarth	WSP UK Ltd.
A0131		Daniel	Davies	Natural Resources Wales				

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0132	Mr	Connor	Furnival	Worfield & Rudge Parish Council				
A0133	Mrs	Catherine	Barclay					
A0134		Benjamin	Barclay					
A0135		Joseph	Barclay					
A0136		Stephen	Barclay					
A0137	Viscount	Alexander	Newport	Bradford Rural Estates Ltd		Jessica	Graham	Savills
A0138		Heather	Woods					
A0139		Chris	Woods					
A0140	Mrs	Margaret	Whittington					
A0141	Ms	Georgina	Sylvester					
A0142	Mrs	Suzanne	Dewhurst					
A0143		Steven	Banfield					
A0144	Mr	Andrew	Christelow	Staffordshire CC M&W Planning				
A0145	Miss	Kathryn	Robertson					
A0146				Wallace Land Investments and Miller Homes Ltd		Rebecca	Dennis	Pegasus Group
A0147	Mr	Peter	Carus	Wallace Land Investments		Rebecca	Dennis	
A0148	Mr	Stuart	Field	L&Q Estates Ltd.	Mr	Jon	Kirby	Lichfields
A0149	Mr	Tom	Britles	Raby Estate	Mr	Guy	Maxfield	WSP
A0150	Mr	David	Smith					
A0151	Mrs	Joyce	Bunn					
A0152	Mr	Kristy	Clarke					
A0153	Mr	Richard	Baker					
A0154	Mr	Terry	Sixsmith					
A0155	Mrs	Rosemary	Sixsmith					



Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0156	Mrs	Katie	Tymon					
A0157	Mrs	Olivia	Healey					
A0158	Mr	James	Healey					
A0159	Mr	Richard	Price					
A0160	Ms	Madeline	Price					
A0161	Mrs	Lisa	Price					
A0162	Mr	John	Partridge					
A0163	Mrs	Tegwyen	Breece					
A0164	Mrs	Jane	Lister					
A0165	Miss	Kelly	Swancote					
A0166	Mr	Stuart	Hughes					
A0167	Mr	James	Halliwell					
A0168	Mrs	Andrea	Greenhouse					
A0169	Mr	Andrew	Greenhouse					
A0170	Mr	Oliver	Greenhouse					
A0171	Mr	Eric	Simmons					
A0172	Mr	Finlay	Greenhouse					
A0173	Mr	Johny	Millington					
A0174	Mrs	Ann	Fryer					
A0175	Mrs	Tracey	Lopez					
A0176	Mr	Richard	Evans					
A0177	Mr	Simon	Watson					
A0178	Mr	Victor	Bryan					
A0179	Mrs	Christine	Bryan					
A0180	Mrs	Margo	Millington					
A0181	Mr	Timothy	Wood					
A0182	Mrs	Alison	Wood					
A0183	Mrs	Jane	Shelton					
A0184	Mr	Chris	Gettings					

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0185	Mrs	Nichola	Gregory					
A0186	Mr	David C	Evans					
A0187	Mrs	June	Evans					
A0188	Mrs	Alison	Dawson					
A0189	Mr	Ian	Dawson					
A0190	Mrs	Sue	Lentle					
A0191	Mrs	Sharon	Crosbie					
A0192	Mr	Barry	Crosbie					
A0193	Mrs	Caroline	Cartner					
A0194	Mr	Jeremy	Hawkey					
A0195	Mr	Kenneth	Cartner					
A0196	Mr	Samuel	Chapman					
A0197	Mr	Philip	Chapman					
A0198	Mrs	Sally	Chapman					
A0199	Mrs	Elizabeth	Schulz					
A0200	Miss	Grace	Lister					
A0201				Persimmon Homes (West Midlands) Ltd	Mr	Sam	Silcocks	Harris Lamb
A0202	Mr	Joseph	Lister					
A0203	Mr	Ian	Lister					
A0204	Mr	Tim	Jones					
A0205	Mrs	Mary	Lewis					
A0206	Mr	Nicholas	Lewis					
A0207	Dr	Kathryne	McQuade					
A0208	Mr	Paul	Officer					
A0209	Mrs	Emily	Officer					
A0210	Mrs	Cheryl	White					
A0211	Mr	Jamie	White					
A0212	Mr	Mark	Spellman					

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0213	Mrs	Jessica	Spellman					
A0214	Mrs	Natalie	Craig					
A0215	Mr	Adam	Craig					
A0216	Miss	Stephanie	Bamford					
A0217	Mr	Michael	Prince					
A0218	Mrs	Melissa	Thomas					
A0219	Mr	Andrew	Hill					
A0220	Miss	Maddison	Brindley					
A0221	Miss	Emily	Boardman					
A0222	Mr	Michael	Boardman					
A0223	Mrs	Suzanne	Boardman					
A0224	Mr	Colin	James					
A0225	Mrs	Jennifer	Tyler					
A0226	Mrs	Susan	Kennedy					
A0227	Mr	Jeremy	Webster					
A0228	Mrs	Sarah	Webster					
A0229	Mrs	Malcolm	Preston					
A0230	Mrs	Judith	Ellison					
A0231	Mr	Howard	Horsley					
A0232	Mr	Keith	Hayward					
A0233	Mrs	Valerie	Hayward					
A0234	Mr	Roland	Bream					
A0235	Mrs	Eileen	Reynolds	Morville Parish Council				
A0236	Mrs	Hope	Grundy	Longdon Village Action Group				
A0237	Mrs	Jemima	Stafford	Longdon Village Action Group				
A0238	Mrs	Heather	Ireland					
A0239	MS	Karin	Harfmann					
A0240	Mrs	Angela	Whitehouse					
A0241	Mr	David	Whitehouse					

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0242	Mr	John	Nolan					
A0243	Mrs	Valerie	Nolan					
A0244	Mr	Christopher	Baldwin					
A0245	Mrs	Mavis	Hunt					
A0246	Mr	Geoffrey	Hunt					
A0247	Mr	Alexander	Findlay					
A0248	Mrs	Sophie	Northridge					
A0249	Ms	Katherine	Hogwood					
A0250	Mrs	Emma-Louise	Findlay					
A0251	Master	Charles	Findlay					
A0252	Master	Frankie	Findlay					
A0253	Mrs	Hayley	Mason					
A0254	Mr	Stevan	Popovic					
A0255		Rebecca	Turner	Save Bridgnorth Greenbelt				
A0256	Mr	John	Johnson					
A0257	Mr	Jonty	Withers					
A0258	Mrs	Philomena	Withers					
A0259	Mrs	Linda	Atkinson					
A0260	Mrs	Jaqueline	Watson					
A0261	Mr	Glenn	Watson					
A0262	Mr	Tom	Biggins					
A0263	Miss	Greta	Pascall					
A0264	Mr	Bernard	Barnett					
A0265	Mr	Rogewr	Pryer					
A0266	Mr	Terry	Overton					
A0267	Mr	Sam	Sharplin					
A0268	Mr	Lawrence	Chitty					
A0269	Mr	Stuart	Ford	Rushmore Business Associates Ltd				
A0270	Miss	Gillian	Painter					
A0271	Mr	Roy	Adlington	Yew Tree Action Group - Highley				

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0272	Mrs	Edith	Alvis					
A0273	Mr	Steven	Alvis					
A0274	Miss	Alison	Childs					
A0275	Mr	Lawson	Bant					
A0276	Mrs	Francesca	Billington					
A0277	Mr	Matthew	Billington					
A0278	Mr	Paul	Billington					
A0279	Mrs	Sheila	Boniface					
A0280	Mr	Tomothy	Bowen					
A0281	Mrs	Karen	Bowen					
A0282	Mr	Tomothy	Bradburn					
A0283	Mr	Paul	Bradburn					
A0284	Mr	Charles	Brookes					
A0285	Mr	Robert	Brookes					
A0286				Shifnal Town Council & Shifnal Matters	Mr	David	Lowin	Bruton Knowles
A0287	Mrs	Elizabeth	Carver					
A0288	Mr	Henry	Carver					
A0289	Miss	Megan	Claydon					
A0290	Mrs	Pamela	Colbourn					
A0291	Mrs	Carey	Cox					
A0292	Mr	Sean	Cox					
A0293	Miss	Shannon	Cox					
A0294	Mrs	Catherine	Crout					
A0295	Mr	Robert	Crout					
A0296	Mrs	Elaine	Davies					
A0297	Mrs	Ellie	Davies					
A0298	Master	Finlay	Davies					
A0299	Mrs	John	Davies					
A0300	Mrs	Karen	Davies					
A0301	Miss	Layla	Davies					
A0302	Mrs	Paul	Davies					
A0303	Mr	Robert	Davies					



Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0304	Mrs	Tricia	Davies					
A0305	Mrs	Annice	Dixon					
A0306	Mr	Peter	Dyson					
A0307	Mr	Alan	Edwards					
A0308	Mrs	Judith	Ellison					
A0309	Mrs	Patricia	England					
A0310	Mr	David	Ferriday					
A0311	Mrs	Katherine	Ferriday					
A0312	Mrs	Linda	Fisher					
A0313	Mr	Paul	Fisher					
A0314	Mr	Donald	Fullwood					
A0315	Ms	Marion	Gordon					
A0316	Mr	James	Helmshaw					
A0317	Mrs	Caroline	Hamilton					
A0318	Mrs	Karen	Haynes					
A0319	Mr	Steven	Haynes					
A0320	Mr	Richard	Jenvey					
A0321	Mr	Hew	Kennedy					
A0322	Mrs	Thomas	Kinsey					
A0323	Mr/Mrs	J & M	Lowe					
A0324	Mrs	Janet	Middleton					
A0325	Mrs	Paul	Middleton					
A0326	Mr	Philip	Henshaw					
A0327	Mrs	Susan	Henshaw					
A0328	Mrs	Charlotte	Hepworth					
A0329	Mr	Brian	Oakley					
A0330	Mrs	Ruth	Oakley					
A0331	Mr	Ian	Ogley					
A0332	Mrs	Kalpna	Parkash					
A0333	Mr	Sukhdev	Parkash					
A0334	Mrs	Eiluned	Parry					
A0335	Miss	Joan	Parry	Trefonen Rural Protection Group				

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0336	Mr	John	Pedley					
A0337	Mrs	Mary	Phillips					
A0338	Miss	Rachel	Powney					
A0339	Mrs	Ann	Richardson					
A0340	Mr	Mark	Richardson					
A0341	Mr	Philip	Swatman					
A0342	Mrs	Gillian	Taylor					
A0343	Mrs	Fifi	Sharplin					
A0344	Mrs	Angela	Potter					
A0345	Mrs	Jaqueline	Pedley					
A0346	Mr	Colin	Rigby					
A0347	Mr	Mark	Davies	Environment Agency				
A0348	Mrs	Elizabeth	Boden	Historic England				
A0349		Grady	McLean	Natural England				
A0350	Mrs	Kate	Tait	Galliers Homes	Mrs	Helen	Howie	Berrys
A0351	Dr and Ms	C. and Z.	Roberts		Mrs	Helen	Howie	Berrys
A0352	Mr	Barry	Price	HP Price & Sons	Mr	Nick	Williams	Berrys
A0353	Mr	N	Williams	Lea Hall Land & Property	Mrs	Helen	Howie	Berrys
A0354	Mr	Robin	Morris	Morris & Co	Mrs	Helen	Howie	Berrys
A0355	Mr	James	Thompson	Sansaw Estate	Mr	Stuart	Thomas	Berrys
A0356	CEG			CEG	Mr	Stuart	Thomas	Berrys
A0357	Ms	Rebecca	May	HIMOR	Mrs	Helen	Howie	Berrys
A0358	Mr	Howard	Thorne	Shropshire Homes	Mrs	Helen	Howie	Berrys
A0359				Aequusland Ltd	Mr	Stuart	Thomas	Berrys
A0360				AFM Farming LLP	Mr	Stuart	Thomas	Berrys
A0361				Cooke Bros.	Mr	Stuart	Thomas	Berrys
A0362		EH & CL	James		Mr	Stuart	Thomas	Berrys
A0363				Evans Enterprises	Mr	Stuart	Thomas	Berrys
A0364				Mattell Trustees	Mr	Stuart	Thomas	Berrys

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0365	Mr	C	Jones		Mr	Michael	Lloyd	Berrys
A0366	Mr	D	Ferris		Mr	Stuart	Thomas	Berrys
A0367	Mr	John	Pritchard		Mr	Stuart	Thomas	Berrys
A0368	Mr	John	West		Mr	Stuart	Thomas	Berrys
A0369	Mr	Lee	Jones		Mr	Stuart	Thomas	Berrys
A0370				Much Wenlock Estates	Mr	Stuart	Thomas	Berrys
A0371	Mr	Adrian	Ward					
A0372		Allan	Dawes					
A0373	Miss	Anna	Moszynska					
A0374	Mrs	Annette	Venvil					
A0375	Mrs	Lorna	Pardoe	Berrington PC				
A0376	Mrs	Elizabeth	Asser					
A0377		Ian	Culley	Association of Black Country Authorities				
A0378				Seabridge Developments Limited	Mr	Andy	Williams	Advance Land & Planning Limited
A0379				Manor Oak Homes	Mr	Geoff	Armstrong	Armstrong Rigg Planning
A0380				National Grid		Amy	Holder	Avison Young
A0381				AM Ventures 1	Mr	Philip	Grant	Avison Young
A0382				Lichfield Diocesan Board of Finance	Mr	Justin	Stevenson	Balfours LLP
A0383				Trustees of the Sweeney Estate	Mr	Michael	Watney	Balfours LLP
A0384	Mr	Stanley	Banfield					
A0385				Bloor Homes	Mr	Mark	Sitch	Barton Willmore LLP
A0386				David Wilson Homes (Mercia)	Mrs	Kathryn	Ventham	Barton Willmore LLP

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0387				Yareal Llandforda Ltd	Mr	James	Bonner	Barton Willmore LLP
A0388	Mrs	Anne	Howels	Baschurch Parish Council				
A0389	Mrs	Vivien	Bellamy					
A0390		Ben	Underwood					
A0391	Mr	Benedict	Jephcott					
A0392	Mrs	Kate	Bentham					
A0393		Mike	Streetly	Better Shrewsbury Transport				
A0394				Bradford Estates	Mr	Steven	Butler	Bidwells
A0395				Midlands Air Ambulance Charity				
A0396	Mr	Mark	Branigna					
A0397	Dr	Clive	Dyson	Bridgnorth Plan Steering Group				
A0398	Mrs	Anne	Harrison					
A0399				Eagles Mews Ltd	Mr	Joe	Nugent	Brownshore Management Ltd
A0400	Mr	Jim	Bunce	Save Snatchfield Group (SSG), All Stretton Village Society (ASVS) and Clive Avenue Residents Association (CARA)				
A0401	professor	Les	Lumsdon	Bus users shropshire				
A0402	Mrs	Debbie	Fifer	Canal & River Trust				
A0403	Mr	Rupert	Harvey		Mrs	Charlene	Sussums-Lewis	Carter Jonas LLP
A0404	Sir	William	Cash					
A0405	Lady	Laura	Cash					

Schedule 3: Unique reference (A reference) assigned to respondents/respondents and their agents

Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0406	Lady	Bridget	Cash					
A0407		William	Cash					
A0408	Mrs	Gill	Cashman					
A0409	Mr	John	Cashman					
A0410	Mr	Charles	Green	CPRE Shropshire				
A0411	Mr	Casper	Gabb					
A0412		Denis	Dreux					
A0413				Cross Hill Consortium	Mr	Mike	Taylor	Chilmark Consulting Ltd
A0414	Mr	Chris	Pelling-Fulford					
A0415	Cllr Mrs	Hilary	Claytonsmith	Church Stretton Town Council				
A0416	Mr	Clive	Morley					
A0417	Cllr	Tina	Woodward					
A0418	Cllr	David	Turner	Shropshire Councillor				
A0419	Mrs	Melanie	Lindsley	The Coal Authority				
A0420	Mr	Colin	Taylor					
A0421	Mr	P	Chapman		Mrs	Rebecca	McAlister	Concept Town Planning Ltd
A0422				T & T Lloyd	Mr	Steven	Hearn	Concept Town Planning Ltd
A0423				West Midlands Resource Technical Advisory Body (WMRTAB)	Mr	Ian	Blake	Director
A0424	Mr	Colin	Cummings					
A0425	Mr	John	Darlow					
A0426	Mrs	Sharon	Darlow					
A0427	Mr	Darren	Hodson					
A0428	Mr	David	Coe					



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Part A Reference	Respondent Title	Respondent First Name	Respondent Last Name	Respondent Organisation (where relevant)	Agent Title (where relevant)	Agent First Name (where relevant)	Agent Last Name (where relevant)	Agent Organisation (where relevant)
A0429	Mr	David	Jones					
A0430				Yareal Llanforda Ltd	Mr	David	Parker	David Parker Planniong Associates
A0431	Mr	D	Parocki					
A0432	Mr	David	Spicer					
A0433		David	Walker					
A0434	Mr	Peter	Davies					
A0435		AJ	Davies					
A0436	Miss	Denise	Kitts					
A0437	Mrs	Diana	Dennis					
A0438	Mr	Martyn	Dennis					
A0439	Mr	Hugh	Devlin					
A0440	Mrs	Harriet	Devlin					
A0441	Mr	Donald	Pearce					
A0442	Mr	Stephen	Downing					
A0443	Dr	Andrew	Howard					
A0444	Dr	Alison	Caffyn					
A0445	Dr	Chantell	Hewitt					
A0446	Dr	Robert	Dennis					
A0447	Ms	Adele	Dray					
A0448	Ms	Elaine	Higgins					
A0449	Mrs & Mr	Ellen & Alan	Morley					
A0450	Mr	John	Coxon	Emery Planning				
A0451	Ms	Phoebe	Farrell					
A0452	Mrs	Jocelyn	Finch					
A0453	Mr & Mrs		Thomas		Miss	C	Buchanan	First City Ltd
A0454	Mr	Stuart	Corbett		Miss	C	Buchanan	First City Ltd

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A0455				The Defence Infrastructure Organisation (DIO)	Mrs	Hannah	Price	Fisher German LLP
A0456	Mrs	Hilary	Flack					
A0457	Mr	Alistair	Horn	Ford PC				
A0458	Ms	Gaye	Wren					
A0459	Mrs	Gillian	Buckridge					
A0460	Ms	Gillian	Howard					
A0461	Mr	Richard	Agnew	Gladman Developments				
A0462	Mrs	Amy	Glover					
A0463	Miss	Elizabeth	Glover					
A0464	Master	Hugo	Glover					
A0465	Mr	Graham	King					
A0466		Roger	Evans	Great Hanwood Parish Council				
A0467		Rebecca	Turner	Great Ness & Little Ness Parish Council				
A0468		Guy	Jones					
A0469	obo	John	O'Dowd	Much Wenlock Civic Society				
A0470	Mr	John	O'Dowd					
A0471	Mrs	Susan	O'Dowd					
A0472	Mrs	M	Rees-Pullman					
A0473		Alison	Utting	Hadnall PC				
A0474	Mr	Charles	Dytor		Mr	Ollie	Thomas	Halls
A0475			Rees-Pullman		Mr	Ollie	Thomas	Halls
A0476				Telereal Trillium	Mr	Sam	Silcocks	Harris Lamb
A0477		Cecil	Hayward					
A0478		Ruth	Hayward					

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A0479	Mr	Andrew	Heaton					
A0480	Ms	Helen	Tedcastle					
A0481		Angela	Newey	Herefordshire Council				
A0482		Hansen	Hansen	Highways England				
A0483	Mr & Mrs	Mike & Sharon	Bailey		Mr	Haydn	Morris	HMPC Limited
A0484	Ms	Laura	Hodgin					
A0485	Ms	H	Wild	Hollins Strategic Land				
A0486	Ms	Charlotte	Hollins	Fordhall Community Land Initiative				
A0487	Ms	Sue	Green	Home Builders Federation (HBF)				
A0488	Mrs	Emma	Hughes					
A0489	Mr	Ian	Warby					
A0490				Pentons Haulage & Cold Storage Retirement Benefit Fund		Justin	Paul	j10 planning
A0491				Shrewsbury Homes & RGS (Timber) Ltd		Justin	Paul	j10 planning
A0492	Mr	Jack	Parry					
A0493	Mrs	Jane	Heming Johnson					
A0494	Mrs.	Jeanette	Hooper	Longden Village Action Group				
A0495				Apley Estate	Mr	Mike	Hopkins	JLL
A0496				Farley Estates Limited	Mr	Darren	Venables	JLL
A0497				Stanmore Consortium	Mr	Mike	Hopkins	JLL
A0498	Mrs	Jennifer	Saunders					
A0499	Mr	James	Orves					
A0500	Mrs	Jody	Dennis					

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A0501	Mr	Robert	Turner					
A0502	Mr	Nicolas	Trott					
A0503	Mrs	Margaret	Trott					
A0504				The Hyde Family	Mr	John	Needham	John Needham Associates
A0505	Mr	Jon	Newson					
A0506	Mr	Jonathan	Lovegrove-Fielden		Mr	Clive	Roberts	Kembertons
A0507	Mr	Clive	Roberts	Kembertons				
A0508	Mr & Mrs	R	Young		Mr	Clive	Roberts	Kembertons
A0509	Mr	R	Homden		Mr	Clive	Roberts	Kembertons
A0510	Mr	R	Tomley		Mr	Clive	Roberts	Kembertons
A0511	Mrs	Wendy	de Capell-Brooke		Mr	Clive	Roberts	Kembertons
A0512				Radnorshire Coal Co. and Messrs B & J Davies	Mr	Clive	Roberts	Kembertons
A0513	Mr	Edward	Maiden		Mr	Clive	Roberts	Kembertons
A0514				The Hobbins Management Co	Mr	Clive	Roberts	Kembertons
A0515	Messrs	C, P and G	Weston			Edward	Landor	Landor Planning Consultants Ltd
A0516		Mr and Mr D Holland				Edward	Landor	Landor Planning Consultants Ltd
A0517	Mrs	Joyce	Jones					
A0518	Mr	Julian	Francis					
A0519	Dr	Karen	Howard					
A0520	Ms	Katharine	Hogwood	Shropshire Music Trust				
A0521	Mr	Jonathan	Kemp	Bedstone & Bucknell PC				
A0522				Berwick Estate		Tom	Stanley	Knight Frank

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A0523	Mr	Lawrence	Fowler					
A0524	Mr	Alan	Leaman					
A0525	Ms	Leela	Cotter					
A0526	Mr	Robin	Morris	Morris Properties Ltd	Mr	Rob	Mills	Les Stephan
A0527	Mr	Dawn	Hart		Mr	Rob	Mills	Les Stephan
A0528	Ms	Dorothy	Fleming	Bridging Loans Ltd	Mr	Les	Stephan	Les Stephan
A0529	Mr	Gareth	Wall	McCartneys LLP	Mr	Les	Stephan	Les Stephan
A0530	Mr	Liam	McCullough		Mr	Rob	Mills	Les Stephan
A0531	Mr	Graham	Powell		Mr	Rob	Mills	Les Stephan
A0532	Mr	Charles	Stanley		Mr	Rob	Mills	Les Stephan
A0533	Mr	Elwyn	Parkes	E.P Parkes & Sons	Mr	Les	Stephan	Les Stephan
A0534	Mr	Tim	Hiles		Mr	Les	Stephan	Les Stephan
A0535		Corey	Richardson					
A0536	Mr	John	Jones		Mr	Les	Stephan	Les Stephan
A0537	Mr	Barry	Price		Mr	Nick	Williams	Berrys
A0538	Mr	Mark	Leather					
A0539	Mr	William	Laidler					
A0540	Mr	Ian	Mason					
A0541	Mr	Ben	Pocock	Dukescroft				
A0542	Ms	Gemma	Parocki					
A0543	Mr	Owen	Fisher					
A0544	Mr	Philip	Lockett					
A0545	Ms	Imogen	Liddle	Ludford Parish Council				
A0546	Mr	Ben	Holloway		Mr	Paul	Madeley	Madeleys
A0547	Mrs	Sandra	Morgan		Mr	Paul	Madeley	Madeleys
A0548	Mr	Malcolm	Philpotts	Alveley Green Belt Preservation Group				
A0549	Mrs	Julie	Jones	Market Drayton Town Council				



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A0550	Mrs	Alison	Roberts					
A0551	Ms	Brenda	Sandilands					
A0552	Mr	Brian	Servant					
A0553	Mrs	Carol	Servant					
A0554	Mrs	Marilyn	Silver	Tong Parish Council				
A0555	Mr	Charles	Simmonds	The Strettons Civic Society				
A0556	Ms	Judy	Spencer					
A0557	Miss	Gemma	Taylor					
A0558	Mr	Jack	Taylor					
A0559	Mr	Nick	Taylor					
A0560	Mrs	Rosalyn	Taylor					
A0561	Mrs	Irene	Toone					
A0562	Mr	John	Toone					
A0563	Mrs	Pauline	Welch					
A0564	Mr	Owen	Evans	Alternate site proposed				
A0565		Roger	Parry	Davies Parry (Oakfields Ltd)				
A0566	Mrs		Creffield					
A0567	Mr	John	Ash		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0568	Mrs	Nicola	Ashworth		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0569		Nick, Catherine, Elizabeth/	Challenor, Evans, Williams		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0570	Mr	Andrew	Davies		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0571	Mr	John	Davies		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0572	Mr & Mrs		Ditty		Mr	Roger	Parry	Roger Parry & Partners Ltd

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A0573	Mrs	Christine	Downes		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0574	Mr & Mrs		Edwards		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0575	Mr & Mrs	Lloyd	Jones		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0576	Mr	Terry	Jones		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0577	Mr	Jeremy	Millington		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0578	Mr & Mrs	S J	Palmer		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0579	Messrs		Pryce & Plaskett		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0580	Mr & Mrs	J	Sandell		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0581	Mr	T	Tudor		Mr	Roger	Parry	Roger Parry & Partners Ltd
A0582	Mr	John	Tootell	Metacre Ltd	Ms	Adrea	Caplan	Savills
A0583				The Brynkinalt Estate	Mr	James	Yeoman	Savills
A0584				Ghenos Hencote Ltd	Mr	Richard	Shaw	Savills
A0585	Messrs	Richard & Philip	Needs & family	Richard & Philip Needs & family	Mr	Michael	Barrow	Savills
A0586		Ian	Willicombe	Nurton Developments Ltd		Elle	Cass	SLR Consulting Limited
A0587			Richardson		Mr	Nigel	Thorns	Nigel Thorns Planning Consultancy
A0588	Mr	M	King	Burbury Investments Ltd	Mr	Nigel	Thorns	Nigel Thorns Planning Consultancy

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A0589	Mr	Jeremy	Shingler	Shingler Homes Ltd	Mr	Nigel	Thorns	Nigel Thorns Planning Consultancy
A0590			Roberts and Dolphin		Mr	Nigel	Thorns	Nigel Thorns Planning Consultancy
A0591	Mr	Matt	Edwards	Hawk Developments Ltd	Mr	Nigel	Thorns	Nigel Thorns Planning Consultancy
A0592		R	Cooke		Mr	Nigel	Thorns	Fieldcrest Partnership LLP
A0593			Parker, Latham, Conacher, Smith, Broad (landowners)		Mr	Nigel	Thorns	Nigel Thorns Planning Consultancy
A0594	Mr	JP	Thorpe		Mr	MW	Parrish	The Planning Group Ltd
A0595				Persimmon Homes & Taylor Wimpey	Mr	Jason	Tait	Planning Prospects Ltd
A0596	Mr	P	Edwards		Ms	Sian	Griffiths	RCA Regeneration Ltd
A0597	Mr	Carl	Higgs	CCB Investments Ltd	Miss	Victoria	Lane	RCA Regeneration Ltd
A0598				Taylor Wimpey UK Ltd				RPS group
A0599				Jennings Estates				RPS group
A0600				Ministry of Defence	Mrs	Jodie	McCabe	Defence Infrastructure Organisation
A0601	Ms	Kari	Burton	Lands improvement Holdings	Mr	Dominick	Veasey	Nexus Planning
A0602	Mr	Nicholas	Goldwyn					
A0603	Councillor	Nick	Bardsley	Shropshire Council				

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A0604	Mr	David	McGlade	Offa's Dyke Association				
A0605	Ms	Sharon	Clayton	Oswestry Rural Parish Council				
A0606	Miss	Vicki	Norman					
A0607	Mr	Paul	Hewitt					
A0608	Ms	Julie	Morgan	Barwood Land	Mr	Keith	Fenwick	Pegasus Group
A0609				Taylor Wimpey UK Ltd	Mr	Jonathan	Burns	Pegasus Group
A0610	Mr	Peter	Richards	Peter Richards and Co Ltd				
A0611	Mr	Richard	Sherratt		Mr	Peter	Richards	Peter Richards and Co Ltd
A0612	Mr	Philip	Woods					
A0613	Ms	Sarah	Matson		Mr	Peter	Richards	Peter Richards and Co Ltd
A0614				Richborough Estates	Mr	Mike	O'Brien	Pinnacle Planning
A0615	Mrs	Rosemary	Price					
A0616	Mr	Tom	Quinn					
A0617	Dr	Ranette	O'Sullivan					
A0618	Mrs	N	Rees					
A0619	Mrs	Robert	Baker					
A0620	Mrs	Robert	Buckeridge					
A0621	Ms	Ashleigh	Genco	Harrow Estates PLC	Mr	Greg	Blaquiere	Terence O'Rourke
A0622	Mrs	Susan	Hulme		Mr	Stephen	Locke	Stepen Locke Associates
A0623	Ms	Fiona	Milden	Vistry Homes Ltd		Ian	Deverell	Turley
A0624	Mr	Justin	Beckett	Belton Farm Trading Ltd		Lewis	Evans	Turley
A0625	Mr	Gawain	Rainey	The Late Lord Harlech Trust				
A0626	Ms	Susan	Christian					

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A0627				Trefonen Rural Protection Group				
A0628	Mr	Tom	Sambrook		Miss	Jo	Hanslip	Urbanissta
A0629		Allan	Wilson	Shropshire Climate Action Partnership				
A0630	Ms	Ruth	Dawes					
A0631	Mrs	Sonya	Staton					
A0632	Mrs	Elizabeth	Sutherland					
A0633	Mr	Trevor	Tarran					
A0634	Mr	Phil	Holden	Shropshire Hills AONB Partnership				
A0635	Dr	Maggie	Hill	Ramblers Association (Shropshire Area)				
A0636				Shifnal Town Council				
A0637				Shifnal Matters	Mr	David	Lowin	Bruton Knowles
A0638	Mr	J	Moore	Shifnal Matters				
A0639	Mrs	Sheila	Rowlands					
A0640	Mr	Robert	Humphreys					
A0641	Mr	Robert	Toft					
A0642	Mr	Robin	Melley					
A0643	Mr	Leslie	Rollins					
A0644	Mrs	Natalie	Rowley					
A0645	Ms	Sheila	Royle					
A0646	Mr	Alan	Grainger	Sundorne Castle Estate		Shelley	Coffey	Rural Solutions
A0647	Miss	Lydia	Bardsley	Ruyton XI Towns Parish Council				
A0648	Mr	Paul	Stokes	Kentucky Fried Chicken GB Ltd	Mr	Steve	Simms	SSA Planning LTD
A0649	Mr	Stephen	Afflect-Drimer					



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A0650	Mr	Steve	Varga					
A0651		Lynne and Graham	Jackson					
A0652				Macdonald Hill Valley Hotel Golf & Spa	Mr	John	Tweddell	Jon Tweddell Planning Ltd
A0653	Mr	Michael	Simms					
A0654		Sarah	Crawford Thomas					
A0655		Mike	Carter	Shrewsbury Civic Society				
A0656		Holly	Jones	Malvern Hills District Council				
A0657				Anglo Beef Processors (ABP)	Mr	Stephen	Ward	Stephen Ward Town Planning and Development Consultants Limited
A0658	Mr	Michael	Hymas	Stretton Climate Care				
A0659		Charles	Simmonds	Strettons Civic Society				
A0660	Mr	David	Jones	Metacre	Mr	Simon	Handy	Strutt & Parker
A0661	Mr	Bill	Griffiths	Tasley Parish Council				
A0662		Gavin	Ashford	Telford & Wrekin Council				
A0663				West Midlands Housing Association Planning Consortium		Leonie	Stoate	Tetlow King Planning
A0664				The Retirement Housing Consortium (McCarthy Stone and Churchill Retirement Living)		Carla	Fulgoni	Planning Manager
A0665	mr	Tom	Clarke	Theatres Trust				
A0666		Tony	Edwards					

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A0667	Mrs	Emma	Turner					
A0668		Mark	Turner					
A0669	Mr	Robert	Graves	Midlands Partnership Foundation NHS Trust (MPFT) and Shropshire Community Health NHS Trust (SCHT).	Mrs	Glenda	Parkes	Tyler-Parkes Partnership
A0670	Mr	Mark	Evans					
A0671		Adam	Brennan	United Utilities				
A0672	Mrs	Kathleen	Kimber	VDS for Trefonen, Treflach & Nantmawr				
A0673		Mike	Bird	Walsall Council				
A0674				Healey Estate	Mr	Simon	Warner	Warner Planning
A0675	Mrs	Sheila	Richardson	Wem Civic Society				
A0676	Mr	Dominic	Bryan	Lidl GB Ltd	Mrs	Julie	White	WSP
A0677	Mrs	Emily	Baker	Worcestershire County Council				
A0678		Judith	Wilson					
A0679		Peter	Wilson					
A0680			Elliott Lynch	Bridgnorth West				
A0681			Les Winwood	Tasley				
A0682				Miller Homes	Mrs	Fiona	Lee-McQueen	Turley