

Shropshire Local Plan

Summary of Responses: Further Consultation on Additional Material Prepared in Response to the Planning Inspectors Interim Findings

Additional Material Subject to this Consultation:

- The newly proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation
- Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report
- Updated Housing and Employment Topic Paper
- Updated Green Belt Topic Paper

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1. Introduction

Interim Findings

- 1.1. On 15th February 2023, the Planning Inspectors examining the draft Shropshire Local Plan issued an Interim Findings document (ID28). This followed completion of the Stage 1 Hearing Sessions, which focused on legal and strategic issues (including strategic policies).
- 1.2. ID28 addressed a range of matters, including the need for additional work to make the draft Shropshire Local Plan sound and inform the ongoing examination.

Further Guidance

- 1.3. The Planning Inspectors issued further guidance on the scope of key components of the additional work required within ID28, on the 4th October 2023 (ID36) and 16th January 2024 (ID37).

Responding to the Interim Findings

- 1.4. In seeking to positively respond to ID28, ID36 and ID37, the Council has prepared a range of additional material to inform the ongoing examination.

Further Consultation

- 1.5. Following approval by Shropshire Council's Cabinet and consistent with the expectations of the Planning Inspectors within ID28, ID36 and ID37; the Council undertook a six-week consultation on key components of this additional material.
- 1.6. Specifically, the consultation sought the views of all interested parties on the soundness and legal compliance of:
 - a. [Draft Policy Regarding Housing Provision for Older People and those with Disabilities](#)
 - b. [Draft Shropshire Local Plan Updated Additional Sustainability Appraisal Report](#)
 - c. [Updated Housing and Employment Topic Paper](#)
 - d. [Updated Green Belt Topic Paper](#)
- 1.7. For the avoidance of doubt, this consultation was not seeking views on other aspects of the draft Shropshire Local Plan.

- 1.8. This consultation ran from the 25th April 2024 to the 11th June 2024. All responses had to be submitted and received by Shropshire Council by 5pm on Tuesday 11th June 2024.
- 1.9. To assist in responding to this consultation, a two-part Response Form (adapted from the Planning Inspectorate's model form) was made available.
 - a. Part A was for personal details.
 - b. Part B was for the actual response(s) - a separate Part B was requested for each response about a relevant paragraph(s) of the consultation document(s).
- 1.10. A Guidance Note was also provided to assist interested parties in responding to the consultation and completing the two-part Response Form.
- 1.11. The consultation was made available on the 'Get Involved' component of the Council's website at: <https://shropshire.gov.uk/get-involved/draft-shropshire-local-plan/>
- 1.12. A link to the 'Get Involved' consultation webpage was also provided from the draft Shropshire Local Plan examination webpages: <https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-calendar/>
- 1.13. The Consultation was consistent with the requirements of the Council's Statement of Community Involvement (SCI) and national legislation.

Consultation Responses

- 1.14. During this consultation, 310 unique respondents submitted 527 duly made responses. Respondents included local residents; businesses; town and parish councils; community groups; landowners and developers; neighbouring local authorities; statutory consultees; and a range of other organisations.
- 1.15. Appropriately redacted versions of these responses are provided on the Shropshire Council website.
- 1.16. 8 respondents submitted non-duly made (late) responses. For completeness, these responses have been summarised and appropriately redacted versions provided on the Shropshire Council website.

2. Consultation Response Summary

Purpose of this Document

- 2.1. The purpose of this document is to:
- a. Provide an overarching **summary** of the key issues raised within duly made responses to the further consultation on additional material prepared in response to ID28, ID36 and ID37.
 - b. Provide a **high-level response** to each of these key issues raised. *For the avoidance of doubt, these responses are high-level and where appropriate the Council intends to expand on them through the ongoing examination process.*
 - c. Provide a **summary** of main comments in each of the duly made responses received to the further consultation on additional material prepared in response to ID28, ID36 and ID37.
 - d. Provide a **high-level response** to each of the duly made responses received. *For the avoidance of doubt, these responses are high-level and where appropriate the Council intends to expand on them through the ongoing examination process.*
 - e. For completeness, provide a summary of and response to non-duly made responses received.
 - f. For transparency and to facilitate the ongoing examination, **identify the respondents** to this consultation.

2.2. **Please Note:**

For the purposes of clarity and to aid analysis, the Council has on occasion been required to divide a single large response into multiple responses.

The views expressed within the summary of responses do not necessarily reflect those of the Council, they are intended to reflect the views of respondents to this consultation, and it is of course recommended that the full response should be read in full.

Structure of this Document

- 2.3. The document contains three schedules:

Schedule 1: Overarching Summary

- a. Summarises the key issues raised within duly made responses to the consultation (this includes those relating to the soundness and legal compliance of the additional material).

- b. Summarises the Council’s high-level response to each of the key issues raised within duly made responses. *For the avoidance of doubt, these responses are high-level and where appropriate the Council intends to expand on them through the ongoing examination process.*
- c. Recognising the interrelationship between the Draft Shropshire Local Plan Updated Additional Sustainability Appraisal Report; Updated Housing and Employment Topic Paper; and Updated Green Belt Topic Paper, key issues across these documents are ‘grouped’. Key issues relating to the Draft Policy Regarding Housing Provision for Older People and those with Disabilities are drawn out separately.

Schedule 2: High-Level Response Summary

- a. Summarises the main comments within duly made responses to the consultation (including where they relate to the soundness and legal compliance of the additional material).
- b. Summarises the Council’s high-level response to each of the duly made responses. *For the avoidance of doubt, these responses are high-level and where appropriate the Council intends to expand on them through the ongoing examination process.*
- c. For completeness, the Council has also summarised and provided responses to non-duly made responses received.
- d. Within the Schedule:
 - Columns 1 and 2 provide the respondents unique reference (A reference) and their response(s) reference (B reference). Each individual respondent is registered once (A Reference). However, each respondent may have multiple response references (B references), numbered B001, B002, B003 etc.
 - Columns 3 and 4 summarise the response to Questions 1 and 2, document(s) and paragraph(s) of these document relevant to the response (where possible, this is as specified by the respondent).
 - Columns 5 and 6 summarises the response to Question 3, whether the response considers the additional material subject to this consultation is legally compliant and sound.
 - Column 7 summarises the main comments within the response (Question 4).
 - Columns 8 and 9 provide a high-level response from Shropshire Council and indicates if modifications are proposed. *For the avoidance of doubt, these responses are high-level and where appropriate the*

Council intends to expand on them through the ongoing examination process.

Please Note: Schedule 2 of this document provides a high-level summary of the responses received. Appropriately redacted copies of these responses are available on the Shropshire Council website.

Schedule 3: Respondents

- a. Provides a list of the names/agents names and unique reference (A reference) assigned to respondents.

3. Schedule 1: Overarching Summary



Consultation Documents:

[Draft Shropshire Local Plan Updated Additional Sustainability Appraisal Report](#)

[Updated Housing and Employment Topic Paper](#)

[Updated Green Belt Topic Paper](#)

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
1	Support for the draft Shropshire Local Plan, the additional Sustainability Appraisal (SA), the updated Housing and Employment Topic Paper and the updated Green Belt Topic Paper. Consider this alleviates Inspectors concerns about previous ambiguity regarding consideration of contributions to the Black Country within the SA.	Noted.
2	The additional SA is not legally compliant as it does not take account of the objectives of the draft Shropshire Local Plan in considering the Black Country need and does not consider reasonable alternatives to the Council's preferred option; as required by the Environmental Assessment of Plans and Programmes Regulations. It is also not sound (positively prepared, justified, effective or consistent with national policy). It does not achieve the Planning Inspectors expectations in ID28 and ID36.	Shropshire Council considers that the additional Sustainability Appraisal (SA), the updated Housing and Employment Topic Paper and the updated Green Belt Topic Paper are legally compliant, sound and achieve the expectations of the Planning Inspectors in ID28, ID36 and ID37. Shropshire Council also considers that subject to the proposed main modifications resulting from this additional work, that the draft Shropshire Local Plan is legally compliant and sound.
3	Objections to the SA methodology and SA objectives utilised.	The additional SA work undertaken by the Council employs a methodology consistent to that utilised within the SA throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.
4	Support for the SA methodology and SA objectives utilised.	Noted.

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
5	Objections to the reasonable options considered within the additional SA.	Shropshire Council considers that it has assessed the reasonable options within each component of the additional SA. Crucially it is the Local Planning Authority that is responsible for determining what constitutes a reasonable option.
6	Support for the reasonable options considered within the additional SA.	Noted.
7	Objections to the 'scoring' within various parts of the additional SA assessment work undertaken; lack of explanation of scoring; failure to total scoring; and applying undue weight given to certain SA objectives (reference to social and economic considerations) and failure to balance considerations across the three pillars of sustainability (social, economic and environmental).	Shropshire Council considers that the additional SA assessment is appropriate, legally compliant, sound and achieve the expectations of the Planning Inspectors in ID28, ID36 and ID37.
8	Support for recognition that the assessment needs to consider balance across the three pillars of sustainability (social, economic and environmental).	Noted.
9	Objections to the updated proposed spatial strategy for the level and distribution of development.	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. The proposed housing and employment land requirements have been informed by and will achieve the Local Housing Need (LHN) calculated using Governments standard methodology / employment land needs calculated using an appropriate methodology identified for Shropshire. The proposed housing and employment land requirements also provides some flexibility to respond to changes to need over the plan period, includes a contribution of 1,500 dwellings / 30ha employment land to unmet cross-boundary need arising within the Black Country, and an opportunity to respond / support other objectives, as identified with the explanation of draft Policy SP2.

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
10	<p>Given the time that has elapsed since the Local Housing Need Assessment was undertaken and submission of the draft Shropshire Local Plan occurred (reference to the fact that National Guidance stipulates such an assessment can be relied upon for two years from submission), consider the Local Housing Need Assessment (2020 base date) should be updated.</p>	<p>It is acknowledged that the draft Shropshire Local Plan was submitted to the Secretary of State in September 2021, and as such the two year period that planning practice guidance stipulates an assessment of Local Housing Need can be relied upon without the need to consider a review has elapsed. However, within ID28 and ID36 the Inspectors have concluded that the Council's approach to identifying housing needs is sound. Furthermore, within ID36 the Inspectors specified that <i>"... even when housing need figures based on LHN become more than 2 years old during an examination there would have to be particular circumstances to require a review. This is because updating housing need figures during an examination can result in a great deal of consequential changes which have the potential to significantly delay the examination and the plan being found sound. We are not currently aware that these circumstances exist here."</i></p> <p>Notably, within ID36 and ID37 the Inspectors specified that the baseline for the additional SA of housing requirement options should be the 2020 assessment of Local Housing Need. It is therefore not considered necessary or appropriate for the Council to utilise an alternative calculation of Local Housing Need to underpin the housing requirement.</p>
11	<p>The Plan period and its housing and employment need calculations are not consistent with paragraph 22 of the National Planning Policy Framework (NPPF), which identifies a minimum period of 15 years from date of adoption. This is unsound.</p> <p>Consider two further years should be added to the proposed plan period and as a result, the proposed housing and employment land requirements need to increase.</p>	<p>Shropshire Council considers the proposed plan period addressed within the draft Shropshire Local Plan is appropriate. Importantly:</p> <ul style="list-style-type: none"> -There is nothing in law requiring a Local Plan to have a minimum 15 year period from adoption. -The National Planning Policy Framework (NPPF) preference for a minimum 15 year period from adoption (paragraph 22) is not a mandatory requirement and shorter timescales can be sound, as established in other Local Plan examinations. The Council considers the primary intention of this preference is to ensure plans are forward-thinking; provide a long-term vision, strategy and basis for sound decision making; and do not unduly restrict growth. This is the case in the draft Shropshire Local Plan, with a spatial strategy underpinned by the principle of 'high-growth'. -The National Planning Practice Guidance (NPPG) on Plan Making addresses the plan period at paragraph 64, indicating that the focus is on ensuring that policies are 'forward thinking' and look over a minimum 15 year

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		<p>period. Again, this is the case in the draft Shropshire Local Plan which addresses a 22 year period and has since submission formed a material consideration in decision making.</p> <ul style="list-style-type: none"> -The proposed plan period continues to align with that of the latter Regulation 18 and Regulation 19 consultations and crucially the submission version of the draft Shropshire Local Plan. -The proposed plan period aligns with the timescales for the proposed vision, objectives, policy framework and settlement strategies within the submission version of the draft Shropshire Local Plan. -The proposed plan period supports the continuation of the spatial strategy proposed within the submission version of the draft Shropshire Local Plan - consistent with the proposed retention of the 1,500 dwelling contribution towards the unmet housing need forecast to arise in the Black Country and the continuation of the 'high-growth' principle that underpins the spatial strategy. -This approach is a pragmatic response to the numerous factors that have had implications for the timescales of the plan making process and meant that adoption of the draft Shropshire Local Plan has not occurred when envisaged by the Council - which would have allowed for more than 15 years remaining within the plan period at adoption. In particular: <ul style="list-style-type: none"> >The Covid 19 pandemic which due to necessary measures to safeguard communities had led to direct delays at key stages in the plan making process; had significant implications on Council resources in order to support the response to the Covid 19 pandemic, leading to delays to the plan making process; and resulted in a specific extension to the timescales for the Regulation 19 consultation. >A number of lengthy and complex objections which required due consideration through the Regulation 19 consultation process and during the ongoing examination processes. This includes a Pre-Action Protocol letter which had a specific implication for the timescales of the examination. -This approach is also a pragmatic approach to avoiding the 'cycle' of examination timescales leading to extensions to plan periods, leading to

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		<p>extension of examination timescales.</p> <p>-This approach is also a pragmatic approach to seeking to positively progress the examination and adoption of the draft Shropshire Local Plan in order to facilitate implementation of the sustainable spatial strategy underpinned by the principle of 'high-growth'.</p> <p>-This approach positively responds to the requirement to review Local Plans every five years.</p> <p>Examples of other circumstances where such an approach has been employed include:</p> <p>-The Hart Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraph 32 of their report (published on 10th February 2020), stating: <i>"There has been some suggestion that the Plan period should be extended. The Plan looks forward 13 years after anticipated adoption, which is below the preferred 15 year time period set out in Paragraph 157 of the NPPF. However, the NPPF's preference is not a set requirement and I consider 13 years to be an appropriate time scale in this instance, particularly as there is now a requirement to review plans every five years."</i> Although the NPPF has been revised since the report, Shropshire Council is of the view that the wording relating to the 15 year time period remain largely unchanged.</p> <p>-The Worthing Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraphs 74-76 of their report (published on 14th October 2022), stating <i>"Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption. As submitted, the Plan period runs from 2020 to 2036. It was anticipated that the Plan would be adopted in 2021 and thus would have met this requirement. The Plan has been prepared during the COVID-19 pandemic, which has had understandable consequences in terms of the preparation and submission of the Plan. This means that the Plan will now be adopted in 2022 and will thus have a lifespan of around 14 years. Although the period will now fall marginally short of the 15 years recommended by the NPPF, I conclude that this does not render it unsound. Delaying the adoption of the plan to address any implications for</i></p>

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		<i>extending the period would be more likely to frustrate, rather than accelerate the delivery of new housing and employment in Worthing. This would be contrary to the Government's objective of significantly boosting the supply of housing and for Councils to have up-to-date plans in place. On balance, a plan period of up to 2036 would remain broadly consistent with the aims of paragraph 22 of the NPPF in allowing adequate time for the Plan's strategic policies to take effect."</i>
12	Objection to the reasonable options for contributions to the Black Country assessed within the additional SA. Suggestions a no contribution options should not have been considered and/or higher contributions should have been considered.	Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional SA specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.
13	Support for proposed contributions to the unmet housing and employment land needs forecast to arise in the Black Country.	Noted.

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14	<p>Objections to the proposed contributions to the unmet housing and employment land needs forecast to arise in the Black Country.</p> <p>-Some suggested no contributions should be made as their was no certainty about the level of unmet needs (particularly since the cessation of work on the joint Black Country Plan); sufficient brownfield land available in the Black Country to meet their needs; changes at the national level mean meeting need is no longer mandatory; and/or Telford is better placed and was intended to accommodate such contributions.</p> <p>-Some suggested contributions should be increased given factors such as changes to the understanding of levels of unmet needs, changes to national policy regarding Green Belt and changes to proposed contributions from other Local Planning Authorities.</p>	<p>Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional SA specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p>
15	<p>Objection to the reasonable options for the housing and employment land requirements within the additional SA. Suggestions these diverge from the options that were previously considered and underpinned the submission version of the draft Shropshire Local Plan.</p> <p>Suggestions that options considered within earlier additional SA work superseded by that subject to this consultation were appropriate.</p> <p>Suggestions that it is unclear how these options have been derived.</p>	<p>Shropshire Council considers that all reasonable options for the housing and employment land requirements have been considered within the additional SA. These options are considered consistent with those assessed within earlier stages of the SA process and those options which underpinned the submission version of the draft Shropshire Local Plan. Furthermore, the reasonable options assessed and assessment process undertaken is considered consistent with the expectations of the Planning Inspectors within ID28, ID36 and ID37.</p> <p>Paragraph 5.7 of ID37 stated <i>"What the SA should do is test options based on the 2020 baseline with 2 extra years, but only look at the growth options tested in the original SA, so a 5, 10 and 15% uplift and look at this with the Black Country unmet needs of 1,500 homes and without it. The results of the SA should then be used to assess what is an appropriate housing requirement in the Plan. The Plan should then make clear what the housing requirement for Shropshire is and how much of the Black Country unmet needs are being accommodated in the Plan. This should be included in Policy SP2 as well as the explanatory text which will need modifying</i></p>

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		<p><i>accordingly.</i>" (paragraph 5.8 of ID37 then indicated the expectation of a similar approach for employment).</p> <p>Paragraph 6.5 of ID37 then stated <i>"What is important is that further SA work is robust, tests different levels of growth (including with and without the Black Country unmet needs). For consistency and clarity these should be the same growth options as the original SA. The housing requirement is a matter for the Council, informed by the new work set out in paragraph 5.7 above."</i></p> <p>Shropshire Council considers that the assessment of reasonable housing and employment land requirement options within the additional SA; the subsequent planning judgement exercise summarised within the Housing and Employment Topic Paper and the proposed modifications to the draft Shropshire Local Plan to reflect the conclusions of this process are legally compliant and sound.</p>
16	Support for the proposed updated housing and employment land requirements, including the continuation of the 'high-growth' strategy and contributions to the unmet needs forecast to arise in the Black Country.	Noted.
17	<p>The re-assessment of housing and employment land requirements within the additional Sustainability Appraisal (SA) and Housing & Employment Topic Paper is not legally compliant, positively prepared, justified, effective, or consistent with national policy.</p> <p>There is no basis for the Council to recast the objectively assessed requirements (need and Shropshire growth factor) for either housing or employment as they have not been found unsound and the Inspectors have not asked for them to be re-assessed (see s20(7C) of the Planning and Compulsory Purchase Act 2004 and Planning Inspectors Examination Procedure Guide).</p>	<p>Shropshire Council considers that the assessment of reasonable housing and employment land requirement options within the additional Sustainability Appraisal (SA) is consistent with the expectations of the Planning Inspectors within ID28, ID36 and ID37.</p> <p>Paragraph 5.7 of ID37 stated <i>"What the SA should do is test options based on the 2020 baseline with 2 extra years, but only look at the growth options tested in the original SA, so a 5, 10 and 15% uplift and look at this with the Black Country unmet needs of 1,500 homes and without it. The results of the SA should then be used to assess what is an appropriate housing requirement in the Plan. The Plan should then make clear what the housing requirement for Shropshire is and how much of the Black Country unmet needs are being accommodated in the Plan. This should be included in Policy SP2 as well as the explanatory text which will need modifying accordingly."</i> (paragraph 5.8 of ID37 then indicated the expectation of a similar approach for employment).</p>

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		<p>Paragraph 6.5 of ID37 then stated <i>"What is important is that further SA work is robust, tests different levels of growth (including with and without the Black Country unmet needs). For consistency and clarity these should be the same growth options as the original SA. The housing requirement is a matter for the Council, informed by the new work set out in paragraph 5.7 above."</i></p> <p>Shropshire Council considers that the assessment of reasonable housing and employment land requirement options within the additional SA; the subsequent planning judgement exercise summarised within the Housing and Employment Topic Paper and the proposed modifications to the draft Shropshire Local Plan to reflect the conclusions of this process are legally compliant and sound.</p>
18	<p>The updated proposed housing and employment land requirements reduce the amount of housing and employment land for Shropshire (from 30,800 dwellings to 29,800 dwellings and 300ha to 290ha respectively). There is no valid justification or legal mechanism to support either of those changes and is neither legally compliant nor sound.</p> <p>-Consider the housing requirement for Shropshire should remain 30,800 dwellings as within the submission plan. The agreed contribution of 1,500 dwellings to the Black Country should then be added to this Shropshire requirement to generate the overall plan requirement of 32,300 dwellings.</p> <p>-Consider the employment land requirement for Shropshire should remain 300ha as within the submission plan. The agreed contribution of 30ha of employment land to the Black Country should then be added to this Shropshire requirement to generate the overall plan requirement of 330ha.</p>	<p>Shropshire Council considers that the assessment of reasonable housing and employment land requirement options within the additional Sustainability Appraisal (SA) is consistent with the expectations of the Planning Inspectors within ID28, ID36 and ID37; legally compliant; and sound.</p> <p>The proposed housing and employment land requirements constitute a continuation of the 'high-growth' strategy within the submission version of the draft Shropshire Local Plan and a continuation of the specific contributions of 1,500 dwellings and 30ha of employment land towards the unmet needs forecast to arise in the Black Country.</p> <p>Shropshire Council also considers that the proposed modifications to the draft Shropshire Local Plan to reflect the conclusions of this process are legally compliant and sound.</p>

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19	<p>The updated proposed housing and employment land requirements include only a 500 dwelling and 20ha contribution to the Black Country, 1,000 dwellings and 10ha short of the proposed contribution (based on the proposed uplift to the housing and employment land requirements). There is no valid justification or legal mechanism to support this change and it is neither legally compliant nor sound.</p>	<p>Shropshire Council considers that the assessment of reasonable housing and employment land requirement options within the additional Sustainability Appraisal (SA) is consistent with the expectations of the Planning Inspectors within ID28, ID36 and ID37; legally compliant; and sound.</p> <p>The proposed housing and employment land requirements constitute a continuation of the 'high-growth' strategy within the submission version of the draft Shropshire Local Plan and a continuation of the specific contributions of 1,500 dwellings and 30ha of employment land towards the unmet needs forecast to arise in the Black Country (the submission version of the draft Shropshire Local Plan specifically included proposed contributions of 1,500 dwellings and 30ha of employment land towards the unmet needs forecast to arise in the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan). Shropshire Council considers that the proposed modifications to the draft Shropshire Local Plan to reflect the conclusions of this process are legally compliant and sound.</p>
20	<p>The updated proposed housing and employment land requirements are unsound.</p> <p>Some suggested they were too high and/or should remain the same as the submission version of the draft Shropshire Local Plan (for reasons including they already achieved the principles of high-growth and appropriate contributions to the Black Country).</p> <p>Others suggested they needed to increase (various reasons and levels of increase proposed – often linked to the plan period, interaction between the proposed contributions to the Black Country and Shropshire issues and opportunities, and the conclusions reached by the Inspectors thus far).</p>	<p>Shropshire Council considers the proposed housing and employment land requirements are justified and sound. Their identification was informed by SA of the reasonable options, which concluded a housing requirement of 31,300 dwellings and employment land requirement of 320ha were the most sustainable options. They were also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings and employment land requirement of 320ha were appropriate.</p> <p>Shropshire Council considers that the assessment of reasonable housing and employment land requirement options within the additional SA; the subsequent planning judgement exercise summarised within the Housing and Employment Topic Paper and the proposed modifications to the draft Shropshire Local Plan to reflect the conclusions of this process are legally compliant and sound.</p>

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21	Support the proposed approach to accommodating proposed uplifts to the housing and employment land requirements (increased settlement guidelines and windfall allowances)	Noted.
22	<p>The approach to accommodating proposed uplifts to the housing and employment land requirements (increased settlement guidelines and windfall allowances) is not sound (positively prepared, justified or consistent with national policy).</p> <p>Some queried why an option involving additional sites allocations was not considered.</p> <p>Various reasons including reliance on windfall allowances is uncertain and/or not proactive/aspirational planning; windfall allowances would not perform as positively as concluded within the additional SA; and increases should be accommodated through site allocation(s).</p> <p>Suggestions these increases should be accommodated through further allocations; intensification of existing allocations; windfall allowances at other settlements / distributed across all settlements. Various benefits for these options identified.</p>	<p>Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by SA of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>For the avoidance of doubt, the reasonable options considered to accommodate the proposed 500 dwelling uplift to the proposed housing requirement included Option 3: Increasing Site Allocations - which involved considering opportunities to extend the site area of proposed allocations in order to increase their capacity and/or opportunities to identify additional site allocations.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
22	<p>National policy stipulates windfall allowances should only be utilised where there is compelling evidence. There is no/insufficient evidence to support the use of increased settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing and employment land requirements. This is unsound.</p> <p>On the contrary windfall allowances should reduce due to national policy changes (biodiversity net gain referenced) and windfall opportunities are finite.</p> <p>Concern was also expressed about the contributions windfall development make to meeting the housing needs of specific groups in the community (specialist housing and affordable housing referenced)</p> <p>Specifically with regard to employment, such windfall opportunities are limited to redevelopment and redevelopment of rural premises and unspecified previously developed land, without compelling evidence to support this approach.</p>	<p>The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p> <p>For the avoidance of doubt, the proposed mechanism for accommodating the uplift to the employment land requirement involves utilisation of existing settlement guidelines and windfall allowances. The Council have an identified employment land supply which totals 413ha of land and includes proposed 'saved' allocations, proposed new allocations and smaller scale windfall development which comprises both brownfield and greenfield land and the redevelopment of premises on established employment areas, within settlements and in rural locations.</p>
24	<p>Evidence in the Housing and Employment Topic Paper demonstrates greater reliance could be placed on windfall development, reducing the need for allocations in the draft Shropshire Local Plan.</p>	<p>Shropshire Council considers the proposed strategy for the level and distribution of development and the framework proposed within the draft Shropshire Local Plan to achieve it are soundly based and justified.</p> <p>Shropshire Council also considers that a robust and proportionate site assessment process has been undertaken to identify proposed allocations.</p>
25	<p>The settlements where uplifts are proposed to housing guidelines and windfall allowances are not suitable locations to accommodate proposed contributions to the Black Country (reference to such factors as location, accessibility and migration/commuting trends etc). This is neither legally compliant nor sound.</p>	<p>Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions.</p> <p>These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
26	<p>Concern was raised about the assessment geography identified within which appropriate sites to accommodate proposed contributions to the Black Country. Reasoning included the use of Place Plan Areas, the distances of some settlements from the Black Country, the different levels of accessibility to the Black Country within Place Plan Areas/settlements; the varying extent of any relationship between settlements in this assessment geography and the Black Country; etc.</p>	<p>The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Shropshire Council considers that this is an appropriate assessment geography within which reasonable options for accommodating contributions to the Black Country will be located. Notably the Inspectors identified that they were content with the approach take to identify an appropriate assessment geography within ID37.</p>
27	<p>None of the allocations in the draft Shropshire Local Plan (for Shropshire's requirements), have been found unsound by the Inspectors, as such they cannot be de-allocated for this purpose and re-allocated to accommodate contributions to the housing or employment land needs of the Black Country - There is no valid justification or legal mechanism to support this change and it is neither legally compliant nor sound (not positively prepared, justified, effective, or consistent with national policy). The sites identified for this purpose are also not suitable. -No explanation as to why exceptional circumstances for release of SHF018b & SHF018d for Shropshire needs has fallen away.</p>	<p>The submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.</p>
28	<p>The 1,500 dwelling and 30ha employment land contributions to the Black Country must be accommodated on new site allocations qualitatively and locationally suited to meeting these needs. Such locations need not accord with the development strategy in the submitted plan which has been found unsound in respect of responding to the needs of the Black Country.</p>	<p>Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
29	The benefits of co-location of housing and employment land contributions should be considered. Reasons include sustainability benefits, ensuring balanced growth and proximity/connectivity to the Black Country.	Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.
30	The sites proposed to accommodate the 1,500 dwelling and 30ha employment land contributions to the Black Country are inappropriate and unsound. Reasons included references to such factors as lack of justification, results of Stage 2a of the SA and site assessment process, availability of alternative sites, impact on Green Belt, location and accessibility to the Black Country (including modes of transport and travel times), migration/commuting trends with the Black Country, suitability of the site for development, impact of development of the site on the associated settlement/wider settlements (particularly infrastructure) etc.	Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.
31	Support for the sites proposed to accommodate the 1,500 dwelling and 30ha employment land contributions to the Black Country. Support of the consideration of alternatives and exceptional circumstances for sites SHF018b and SHF018d.	Noted.

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
32	<p>The 1,500 dwelling and 30ha employment land contributions to the Black Country are proposed to be accommodated on existing proposed site allocations. As such, need to offset this with new site allocations for Shropshire needs.</p>	<p>Shropshire Council considers the proposed housing and employment land requirements are soundly based and justified. Their identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings and an employment land requirement of 320ha was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded a housing requirement of 31,300 dwellings and employment land requirement of 320ha was appropriate. It should be noted that the submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. It should also be noted that the Council has identified a robust land supply which provides confidence in the deliverability of these requirements.</p>
33	<p>Allocations proposed to accommodate contributions to the Black Country also contain housing to meet Shropshire requirements. This is not consistent with requirements for Authorities Monitoring Reports in regulation 34 (3) of the Town and Country Planning Act or the Inspectors' requirements for monitoring in paragraph 26 of ID28. Sites to accommodate contributions to the Black Country should be solely for this purpose.</p>	<p>Shropshire Council considers the proposed approach to accommodating contributions to the Black Country is consistent with the Local Plan (England) Regulations. The Council is able to record the dwellings completed on relevant sites for the purposes of meeting the total housing and employment land requirements and the specific component of the overall housing and employment land requirements that constitute the proposed contributions to the Black Country, in the period in respect of which the report is made, and since the policy was first adopted.</p>
34	<p>Unclear how the Stage 2a assessment was updated in the context of considering sites to accommodate proposed contributions to the Black Country.</p>	<p>Chapter 12 of the additional Sustainability Appraisal explains the methodology for this assessment.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
35	<p>The additional SA site assessment process of sites to accommodate contributions to the Black Country need to have regard to different objectives and measures of assessment to those used when assessing sites in the context of the wider Shropshire requirement.</p> <ul style="list-style-type: none"> -The SA objectives are not appropriate to assess sites to accommodate contributions to the Black Country. -Consider it is illogical that the criteria in Stage 2b of the site assessment are not updated in the context of sites to accommodate contributions to the Black Country. - Stages 2 and 3 of the additional SA site assessments only consider factors relevant to Shropshire, they are not specific to the Black Country (factors applied at stage 3 are the most critical). 	<p>Shropshire Council considers an objective, robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country.</p> <p>Shropshire Council considers that:</p> <ul style="list-style-type: none"> -The site assessment process inherently considered the objectives of the draft Shropshire Local Plan in arriving at conclusions. <p>Shropshire Council considers that the SA Objectives are appropriate to assess the sustainability of sites to accommodate the needs of Shropshire and any contribution to the Black Country. These SA objectives were identified through the 'Scoping' stage of the SA process and the Council also considers it is important to utilise a consistent 'yardstick' for SA process.</p> <ul style="list-style-type: none"> -Stage 2b of the site assessment process, which involved a 'filter' to 'narrow down' the sites considered in Stage 3 of the site assessment process to be appropriate for both the assessment of the sustainability of sites to accommodate the needs of Shropshire and any contribution to the Black Country. Notably the Inspectors identified that they did not consider further work was required on this matter within ID37. -Stage 3 of the site assessment process is appropriate for both the assessment of the sustainability of sites to accommodate the needs of Shropshire and any contribution to the Black Country. It considered all reasonable sites; the general assessment considerations are relevant irrespective of the 'need' to be accommodated; and it involved additional assessment considerations regarding the relationship of the site and where appropriate the associated settlement to the Black Country; and the potential of the site to accommodate all or part of the proposed contribution to the Black Country. Notably the Inspectors identified that they did not consider further work was required on this matter within ID37.

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
36	Safeguarded land for future needs of the Black Country should be identified.	The proposed contribution to the unmet needs forecast to arise within the Black Country are informed by the Duty to Cooperate process undertaken with the Black Country, this additional SA work and the planning judgement exercise summarised within the Housing and Employment Topic Paper. Any future contribution to the Black Country will be informed by a similar process during the preparation of a new Development Plan for Shropshire.
37	The additional SA was not objective and pre-determined outcomes (specific reference to commitment that no additional allocations were required to accommodate contributions to the Black Country).	For the avoidance of doubt, outcomes of the additional SA site assessment process were not pre-determined or constrained in any way, including by previous Cabinet Reports.
38	Question whether consideration of Green Belt in the additional SA and site assessment was appropriate. This was reliant on a flawed Green Belt Assessment & Review.	Shropshire Council considers that the Green Belt Assessment & Review are proportionate and robust. Shropshire Council also considers that a robust and proportionate site assessment process has been undertaken. During this process consideration was given to whether a site was located within the Green Belt and if it was the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.
39	Support for the assessment of reasonable alternatives and identification of exceptional circumstances to justify release of land from the Green Belt.	Noted.
40	The Green Belt Topic Paper reports conclusions when it should inform site selection. As such it is unsound.	Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. When undertaking this site assessment process consideration was given to whether a site was located within the Green Belt and if it was the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed. This is summarised within the additional SA, the updated Housing and Employment Topic Paper and the updated Green Belt Topic Paper.

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
41	The Green Belt Topic Paper does not adequately respond to the Inspectors request for clear and distinct assessments of the exceptional circumstances for releasing Green Belt for Shropshire and Black Country purposes.	Shropshire Council considers that the Green Belt Topic Paper is clear and unambiguous. The Topic Paper (supported by other relevant documents) effectively summarises the consideration of alternative options and identified exceptional circumstances for all sites proposed to be released from the Green Belt. Clear distinction is provided between the consideration of alternative options and identification of exceptional circumstances in the context of Shropshire and Black Country purposes.
42	Alternative sites to SHF018b & SHF018d located outside the Green Belt/with less harm to the Green Belt need to be considered for accommodating proposed contributions to the Black Country.	Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper. When undertaking this site assessment process consideration was given to whether a site was located within the Green Belt and if it was the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed. This is summarised within the additional SA, the updated Housing and Employment Topic Paper and the updated Green Belt Topic Paper.
43	Concern raised about the assessment of various proposed site allocations within the additional SA and site assessment work.	Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to support the achievement of the proposed spatial strategy for Shropshire – including the proposed contribution to the unmet needs forecast to arise in the Black Country. Clear explanation of the decision making applied in reaching these conclusions is provided.
44	Support expressed for various proposed site allocations both within/not within the additional SA and site assessment work.	Noted.

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
45	Specific concern about the suitability and deliverability of proposed allocation SHR166 – reference to the recent designation of a Scheduled Monument on much of the site, which occurred after submission of the draft Shropshire Local Plan.	Shropshire Council recognises that much of site SHR166 contains a newly designated Scheduled Monument (designated in late 2022). This matter is currently being given due consideration, informed by ongoing engagement with the site promoter. The Council expects for this issue to be considered through the 'stage 2' hearing sessions.
46	Concern raised about the assessment of various omission sites within the additional SA and site assessment work.	Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to support the achievement of the proposed spatial strategy for Shropshire – including the proposed contribution to the unmet needs forecast to arise in the Black Country. Clear explanation of the decision making applied in reaching these conclusions is provided.
47	Support for the assessment of various omission sites within the additional SA and site assessment work.	Noted.
48	Numerous sites promoted to contribute to accommodating proposed uplifts to the housing and employment land requirements. Promoters of these sites often indicated they considered that these sites are more sustainable / appropriate.	Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.
49	Numerous sites promoted to contribute to accommodating proposed housing and employment land contributions to the Black Country. Promoters of these sites often indicated they considered that these sites are more sustainable / appropriate.	Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
50	Numerous sites promoted to contribute to a robust housing land supply.	<p>Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper. Shropshire Council also considers that the assessment of housing land supply summarised within the Housing and Employment Topic paper is robust. A more detailed explanation of this assessment and the components of the identified housing land supply is provided within GC47: Five Year Housing Land Supply Assessment (2023 base date).</p>
51	Concern was expressed about the proposed strategy diverging from the strategy within 'made' Neighbourhood Plans and the wishes of these communities.	<p>Proposals within the draft Shropshire Local Plan and proposed modifications resulting from this additional assessment work have been informed by community engagement. The draft Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period and it is considered the proposed modifications resulting from this additional assessment work continue to achieve this principle. In the case of Much Wenlock and Shifnal, both their Neighbourhood Plans cover the period to 2026 (aligning with the adopted Development Plan), and therefore there is a need for the Council to plan effectively for a further 12 years to the end of the new plan period to 2038. In these cases, the draft Shropshire Local Plan provides a development strategy for these areas.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
52	Concern that the presence of a five year housing land supply cannot be assessed as components of the supply are not before the examination.	Shropshire Council considers that the assessment of housing land supply summarised within the Housing and Employment Topic paper is robust. A more detailed explanation of this assessment and the components of the identified housing land supply is provided within GC47: Five Year Housing Land Supply Assessment (2023 base date). The Council notes that during Local Plan examinations, determination of whether a 5 year housing land supply exists inevitably involve consideration of sites not proposed for allocation within the plan subject to examination, as a housing land supply invariably extends beyond such sites. This is not considered unique to Shropshire or indeed in any way unusual. The Council remain keen for the examination to consider the housing land supply identified in Shropshire.
53	Critiques of the Council's housing land supply, concluding the identified supply is insufficient.	Shropshire Council considers that the assessment of housing land supply summarised within the Housing and Employment Topic paper is robust. A more detailed explanation of this assessment and the components of the identified housing land supply is provided within GC47: Five Year Housing Land Supply Assessment (2023 base date).
54	Objections to the proposed strategies for specific settlements and the approach to them within the additional Sustainability Appraisal (SA), the updated Housing and Employment Topic Paper and the updated Green Belt Topic Paper. Particular reference to Alveley, Bayston Hill, Bridgnorth, Highley, Much Wenlock and Shifnal).	Shropshire Council considers the proposed development strategies for settlements across Shropshire (including Alveley, Bayston Hill, Bridgnorth, Highley, Much Wenlock and Shifnal) are appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including where relevant existing allocations), where relevant proposed allocations and where relevant proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers that proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of all relevant information. Where appropriate this included whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.
55	Support for the proposed strategy for Albrighton and the approach to the village within the additional Sustainability Appraisal (SA), the updated Housing and Employment Topic Paper and the updated Green Belt Topic Paper.	Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.

Document:**[Draft Policy Regarding Housing Provision for Older People and those with Disabilities](#)**

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
1	The draft policy is unsound (not positively prepared, justified, effective or consistent with national policy).	<p>Shropshire Council considers the draft policy is sound. It is positively prepared, justified and consistent with national policy. In particular it responds to:</p> <ul style="list-style-type: none">-Evidence within the Strategic Housing Market Assessment (SHMA), which indicates Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average.-Paragraph 63 of the National Planning Policy Framework (NPPF), which specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.-Paragraphs 38-41 of the Inspectors Interim Findings (ID28), which concluded there is a need for more certainty regarding how specialist housing will be delivered in Shropshire.-Shropshire Council considers the requirements of the draft policy have where appropriate been informed by Whole Plan Viability Assessment. <p>The draft policy provides a range of mechanisms to support provision of accessible and adaptable housing and appropriate forms of specialist housing, to support meeting the housing needs of older people and those with disabilities and special needs in a manner that complements the People's Strategy for Shropshire (a key part of the Social Care Strategy for Shropshire) and the wider spatial strategy proposed within the draft Shropshire Local Plan.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
2	<p>The draft policy is too long and/or vague and/or complex and/or inflexible, so unsound.</p> <p>A suggestion was that this could be addressed by moving parts of the draft policy into the explanation.</p>	<p>Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.</p> <p>The Council considers the requirements of the policy are necessary given it addresses a significant range of issues.</p> <p>The Council does not consider it appropriate for policy requirements to be moved into the policy explanation.</p>
3	<p>The draft policy is mere platitudes which will not be implemented or will not deliver sufficient specialist housing.</p>	<p>This draft policy is intended to form part of the future Development Plan for Shropshire. The Development Plan forms the starting point for decision making on planning applications.</p> <p>Shropshire Council considers the draft policy provides a range of mechanisms to support provision of accessible and adaptable housing and appropriate forms of specialist housing, to support the achievement of the housing needs of older people and those with disabilities and special needs in a manner that complements the People’s Strategy for Shropshire (a key part of the Social Care Strategy for Shropshire) and the wider spatial strategy proposed within the draft Shropshire Local Plan.</p>
4	<p>The draft policy should be supported by reference to supporting documents (example provided GC26).</p>	<p>Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.</p> <p>The draft policy is supported by a detailed explanation which assists in its implementation and cross references relevant further information (including GC26).</p>
5	<p>Further detail is required within the policy explanation to support implementation.</p>	<p>Shropshire Council considers that the policy explanation is appropriate and will assist implementation.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
6	<p>With regard to the mechanisms in the draft policy to support provision of accessible and adaptable housing and appropriate forms of specialist housing:</p> <ul style="list-style-type: none"> -General support for the mechanisms / specific mechanisms. -A range of detailed concerns were raised relating to the necessity of these mechanisms / specific mechanisms, particularly related to the implications for viability and deliverability of development. -Data on changes to the demographics of Shropshire between the 2011 and 2021 censuses support the need to provide homes to meet the needs of older people. -Data on changes to the demographics of Shropshire between the 2011 and 2021 censuses highlight the need to attract younger families and the economically active to Shropshire. -Given the demographics of Shropshire, the draft policy does not go far enough. 	<p>Shropshire Council considers the draft policy is necessary as:</p> <ul style="list-style-type: none"> -Evidence within the SHMA indicates Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. -Paragraph 63 of the NPPF specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. -Paragraphs 38-41 of ID28 concluded there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. -The requirements of the draft policy have where appropriate been informed by viability assessment. <p>The draft policy provides a range of mechanisms to support provision of accessible and adaptable housing and appropriate forms of specialist housing, to support meeting the housing needs of older people and those with disabilities and special needs in a manner that complements the People’s Strategy for Shropshire (a key part of the Social Care Strategy for Shropshire) and the wider spatial strategy proposed within the draft Shropshire Local Plan.</p> <p>Shropshire Council also considers the draft policy, alongside other policies in the draft Shropshire Local Plan, support the provision of housing to meet the needs of all groups (including families) in our communities.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
7	<p>With regard to principle of supporting people to remain independent within their own homes and within their existing communities and support networks for as long as possible, within the People's Strategy for Shropshire:</p> <ul style="list-style-type: none"> -Some endorsed this approach. -Some considered this was only achievable if greater resourcing is provided to the adult social care sector. -Some considered this was inappropriate and unsound (some of which suggested a greater focus on the role of specialist housing others suggested a greater focus on accessible and adaptable housing). 	<p>The People's Strategy for Shropshire (a key part of the Social Care Strategy for Shropshire) outlines the Council's approach to effectively meeting the needs of older people and others requiring care in our communities. The purpose of this draft policy is to support the achievement of the housing needs of older people and those with disabilities and special needs, in a manner that complements this strategy and the wider spatial strategy proposed within the draft Shropshire Local Plan.</p>
8	<p>Provision of specialist housing would 'free-up' general housing for others in the community and could facilitate short-term care/rehabilitation and through this hospital discharges.</p>	<p>Noted. The Council recognises provision of specialist housing can meet the needs of older people and those with disabilities and special need, in turn 'freeing-up' general housing for others to occupy. This same principle applies to provision of other forms of housing which meet the needs of groups in our communities.</p> <p>Shropshire Council considers the draft policy, alongside other policies in the draft Shropshire Local Plan, support the provision of housing to meet the needs of all groups (including families) in our communities. The Council recognises provision of specialist housing can potentially support short-term care and rehabilitation which can support hospital discharges. However, this issue is often more complex than having an appropriate location to provide such services. The Council is proactively working with the NHS through the Integrated Care Board (ICB) on this and other related matters.</p>
9	<p>Need to ensure that specialist housing is support by appropriate infrastructure.</p>	<p>Draft Policy DP25 of the draft Shropshire Local Plan addresses the provision of necessary supporting infrastructure.</p> <p>Notably, paragraph 10 of this draft policy specifies wherever possible benefit from access to services and facilities as this supports the independence of future residents and also contributes to achieving sustainable, inclusive and multi-generational communities.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
10	Concern specialist housing was not specifically considered within the Whole Plan Viability Assessment for Shropshire / conclusions on viability were deferred to planning applications. This approach is unsound.	The Whole Plan Viability Assessment considered specialist housing and concluded it will be " <i>subject to a viability assessment at the point of a planning application</i> ". This approach is considered to be consistent with national guidance. The Council considers specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations.
11	Policy cross-referencing is unnecessary as the draft Shropshire Local Plan is intended to be read and applied as a whole.	Shropshire Council supports recognition that the draft Shropshire Local Plan is intended to be read and applied as a whole. However, to aid understanding and application of the draft policy it is considered appropriate to cross-reference other policies of particular relevance.
12	With regard to paragraph 1 : -Some suggested it is unsound as it is not policy, so is either unnecessary or should be moved into the explanation. -Others suggested unsound as it was unclear about the role of specialist housing in meeting the needs of older people and those with disabilities and special needs.	Shropshire Council considers paragraph 1 of the draft Policy effectively establishes the principle that housing required to meet the needs of older people and those with disabilities and special needs includes both accessible and adaptable housing and appropriate forms of specialist housing.
13	Consider there are further options to those in paragraphs 2-6 to support independence of older people and those with disabilities and special needs in rural areas. Examples provided included supporting down-sizing and providing extended family homes/opportunities for extended families on the same site.	Draft Policy DP1 of the draft Shropshire Local Plan addresses housing mix, with the intention of ensuring smaller housing which could facilitate downsizing.
14	Query whether paragraphs 2 and 7 , regarding achievement of M4(3) standard in housing for older people, 'over-lap'.	Shropshire Council acknowledges the requirements of paragraphs 2 and 7 are comparable and as such is proposing a main modification (deletion of paragraph 2) in response.

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
15	<p>Consider requirements of paragraphs 2 and 7, regarding achievement of M4(3) standard in housing for older people, are unclear and/or unsound. Reasons included:</p> <ul style="list-style-type: none"> -This requirement had not been subject to viability testing. -Costs attributed to achievement of the M4(3) standard within viability testing are too low. -It would have a significant cost implication which would undermine delivery. -It would reduce the number of specialist housing units that could be delivered within a scheme. 	<p>Shropshire Council would be very surprised if it was suggested achievement of the M4(3) (wheelchair user dwellings) standard constitutes an additional cost for specialist housing specifically designed for older people or those with disabilities and special needs. It is expected achievement of this standard is a default design requirement for any such housing, to ensure it meets the current/future needs of intended occupiers. Particularly as Government is proposing to require M4(2) accessible and adaptable standards as a minimum requirement for all dwellings. It is also important to recognise that much of this form of housing benefits from economies of scale in achieving these design requirements. Finally, the Council would note that this proposed requirement already formed part of the submission version of the draft Shropshire Local Plan.</p>
16	<p>With regard to paragraphs 3 and 4, regarding the requirement to achievement of specified proportions of M4(2) and M4(3) standard dwellings on sites of 5 or more dwellings and encouragement to achieve M4(2) standard for all dwellings not subject to these requirements:</p> <ul style="list-style-type: none"> -Some considered the requirements should have been subject to viability assessment. -Some considered the requirements will undermine viability and so were unsound. -Some considered the requirements are unjustified. -Some considered the requirements are unclear / unimplementable so unsound (particular query about reference to exceeding standards and interaction with paragraphs 15-17). -Some considered the circumstances where the requirements are not achievable. -Some considered the M4(3) standard properties would not be suitable for other occupiers. 	<p>Shropshire Council considers the draft policy (including paragraphs 3 and 4) is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. The SHMA calculates a total need for M4(2) and M4(3) housing equivalent to 77% of total household growth (of which M4(3) constitutes around 13%). It is recognised that part of this need can be met within specialist accommodation, however Government's reform of Health and Adult Social Care is underpinned by the principle of sustaining people at home for as long as possible, this principle is also reflected within the Shropshire People's Strategy. As such Shropshire Council considers the SHMA justifies the proposed requirements for M4(2) and M4(3) standard dwellings on sites of 5 or more dwellings and encouragement of M4(2) standards for all other dwellings. To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken. The M4(2) and M4(3) standards proposed for sites of 5 or more dwellings are specifically considered within this assessment.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
	<p>-Some considered a better approach would be to secure S106 contributions for off-site provision.</p> <p>-Some considered the requirements should be increased / extended to all dwellings (achievement of M4(2) standard as a minimum).</p> <p>-Some emphasised the need for these requirements to be considered during the determination of planning applications.</p>	<p>Government is currently considering increasing minimum accessibility standard in Building Regulations to align with the M4(2) standard. The draft Policy includes recognition that there may be site-specific factors which mean achievement of M4(2) and/or M4(3) standards are not achievable.</p> <p>Reference to achieving higher building regulation standards is in the context of M4(2) provision, recognising over-provision of M4(3) reduces the amount of M4(2) required; the Council consider this is clear and unambiguous.</p>
17	<p>There are two tiers to the M4(3) standard – wheelchair accessible and wheelchair adaptable, use of the term ‘wheelchair user homes’ is unclear. National guidance stipulates wheelchair accessible housing can only be required where the Council has nomination rites for occupiers, which is important as there is a significant cost differential. This requirement is therefore unclear and unsound.</p>	<p>Shropshire Council considers the term ‘wheelchair user homes’ is an effective ‘collective’ term for M4(3) housing. The explanation to the draft Policy explains <i>"Where dwellings are required to meet M4(3) (wheelchair user dwellings) standard within Building Regulations to comply with this policy, they will normally consist of wheelchair adaptable homes. Wheelchair accessible homes will only be required where Shropshire Council is responsible for nominating a person to live in the dwelling."</i></p>
18	<p>Query whether achieving M4(3) and dementia friendly standards required in paragraph 5 are reasonable and the dementia friendly standard actually has a minimal additional cost, as this has not been viability tested.</p>	<p>The explanation to the draft Policy includes reference to the Dementia Friendly Housing Guide which provides guidance on achieving dementia friendly housing. This includes a checklist which addresses layout, decor, lighting, flooring, furnishings, seating, signage, toilets navigation, parking, noise and quiet space. The Council considers that achieving dementia friendly design within M4(3) (where such provision is required) housing is a minimal cost - it is about ensuring these matters and the needs of occupiers with dementia are considered from the outset.</p>
10	<p>Consider paragraph 6 should ‘require’ rather than ‘encourage’ housing achieving the M4(2) standard to be ‘friendly’ to those with dementia and to those with disabilities and special needs.</p>	<p>Shropshire Council considers that the draft policy strikes an appropriate balance on accessibility and dementia/disability friendly design standards.</p>
20	<p>Concern was raised about paragraph 8 requiring affordable housing provision from specialist housing schemes, which is unsound.</p>	<p>Paragraph 18 does not seek affordable housing contributions from specialist housing, rather it recognises that in some instances specialist housing can also constitute affordable housing.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
21	<p>With regard to paragraph 9 regarding integration of specialist housing into existing and new communities:</p> <ul style="list-style-type: none"> -Due to security requirements, concern was raised about the soundness of the expectation that specialist housing is not apart/gated-off from existing and new communities, within of the draft policy. -Conversely, other supported these requirement. 	<p>Shropshire Council recognises some specialist housing may have specific security and operational requirements. However, it is considered these can be achieved whilst ensuring it integrates into rather than being gated-off from existing and new communities. This integration is considered essential in order to ensure sustainable, inclusive and multi-generational communities.</p>
22	<p>With regard to paragraph 10, regarding the location of specialist housing and access to services and facilities:</p> <ul style="list-style-type: none"> -Some supported these requirement. -Some considered it was unsound and should 'require' specialist housing to be accessible to existing services and facilities, rather than this being 'ideal'. 	<p>The Council considers it is important to ensure specialist housing can wherever possible benefit from access to services and facilities as this supports the independence of future residents and also contributes to achieving sustainable, inclusive and multi-generational communities. However, it is considered necessary to allow an element of flexibility regarding the location of specialist housing, in order to positively respond to the needs of our communities. However, the policy is clear that where necessary services and facilities are not available, they should form part of the development. The policy and its explanation are also clear that where there is a need for specific services and facilities on-site, this provision should be responsive to the types of services and facilities already available in the area and be proportionate in scale to the specialist housing.</p>
23	<p>With regard to paragraph 11, which encourages proactive consideration of the potential to provide key worker accommodation within specialist housing schemes:</p> <ul style="list-style-type: none"> -Concern raised about whether this is clear for decision makers. -Concern raised about the cost/deliverability implications. -Conversely, others supported this paragraph and/or felt the encouragement should be strengthened. 	<p>Shropshire Council considers the draft policy (including paragraph 11) is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. The draft Shropshire Local Plan includes a range of mechanisms to support the delivery of market and affordable housing to meet the needs of key workers. Such provision is considered within the Whole Plan Viability Assessment. It is considered encouragement of consideration of opportunities for such provision within specialist housing schemes complements these wider mechanisms, but it is not considered proportionate to require such provision within specialist housing schemes. For the avoidance of doubt, paragraph 11 encourages positive consideration of key worker housing, it does not specifically require it.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
24	Recognise specialist housing can performed an employment role on mixed-use sites, as per paragraph 14 . However, this is only appropriate where such specialist housing also complies with paragraphs 9 and 10 of the policy.	Paragraphs 9 and 10 are applicable to all forms of specialist housing, including those on mixed-use employment sites.
25	<p>Objections to the soundness of the requirements of paragraphs 15-17, which specify expectations for proportions of specialist housing provision on development sites of 50 or more dwellings. Reasons included:</p> <ul style="list-style-type: none"> -Proposed rates are not justified (including lack of consideration of potential yield through other mechanisms). -Proposed rates were too high and overly-restrictive. -Proposed rates were inflexible and should instead require consideration of latest housing need evidence. -Proposed rates had not been subject to viability testing. -There is no reflection of the differing viability across the Shropshire geography, within the policy. -The requirements disproportionately impact on larger developments, without justification. -The requirements would have a significant cost implication. -The requirements are not deliverable (including because on smaller schemes the amount of provision is too low to be attractive to care providers) or would delay delivery of the site. -Other mechanisms should be considered (including through provision on employment land or S106 contributions for off-site provision). -Concern about impact on ability to provide supporting infrastructure, affordable housing etc. -There is a need to identify circumstances where a departure is appropriate due to site specific factors and/or local circumstances/local need and/or lack of demand from providers. -There is a need to provide flexibility in circumstances where the requirements make development unviable. 	<p>Shropshire Council considers the requirements of paragraphs 15-17 are necessary and appropriate. Specifically it is considered appropriate to specify proportions of specialist housing expected on larger development sites to ensure such provision is provided in a way which contributes to the achievement of sustainable, integrated and multi-generational communities. The Council also considers the proposed thresholds are appropriate and responsive to:</p> <ul style="list-style-type: none"> -Evidence within the SHMA, which indicates Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. -Paragraph 63 of the NPPF, which specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. -Paragraphs 38-41 of ID28, which concluded there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. -The Council’s understanding of the nature of development schemes that occur in Shropshire. <p>To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken. With regard to specialist housing provision, this assessment concludes such housing will be <i>"subject to a viability assessment at the point of a planning application"</i>, this is consistent with national guidance.</p> <p>It is important to note that the Council considers specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
	<p>Conversely, others fully supported this approach or felt rates should be higher and/or apply to other sites not just proposed allocations and/or thresholds for provision lowered.</p>	<p>However, the Council recognises that viability can vary between the different forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution, this mix can be responsive to needs and development viability.</p> <p>Similarly, the Council recognises that the 'minimum size' for a specialist housing scheme to be attractive to an operator varies across the forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution, this mix can be responsive to needs and operator expectations.</p> <p>It is also important to note that many forms of specialist housing represent high-density development and as such can achieve effective use of land enhancing viability, may also constitute a proportion of the affordable housing contribution, and also represents an additional outlet on the scheme (extending the sites 'market' and positively supporting deliverability and delivery timescales - aligning with Government aspirations).</p> <p>However, it is acknowledged there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such:</p> <ul style="list-style-type: none"> -The Council is proposing a modification to paragraph 19 of the draft Policy to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies. -To ensure greater consistency with the conclusions of the Whole Plan Viability Assessment, the Council is proposing a modification to allow provision of reduced rates of specialist housing where it is

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
		<p>demonstrated specified requirements are creating viability concerns for otherwise sustainable schemes.</p> <p>-It is recognised there may be circumstances where a specific site is unsuitable for specialist housing or there is no identified need for such housing in the area; as such the Council proposes a modification to allow for provision of reduced rates of specialist housing provision where the Council agrees one or both of these circumstances apply.</p>
26	<p>Greater clarity needed regarding proportions of specialist housing provision required in paragraphs 15-17 for phased development sites of 50 or more dwellings</p>	<p>Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.</p> <p>The level of specialist housing expected on a developments of 50 or more dwellings is the specified percentage of the total dwellings, irrespective of whether the development is phased or not.</p>
27	<p>Consider the requirements of paragraph 18 regarding the relationship between specialist housing provision and affordable housing provision is unclear.</p> <p>Conversely, others supported this paragraph.</p>	<p>Shropshire Council considers paragraph 18 is clear that specialist housing can constitute affordable housing. However, the Council recognises that the needs for specialist housing extend beyond the affordable sector; furthermore the affordable housing required in Shropshire extends beyond specialist housing. Paragraph 18 therefore ensures an appropriate mix of affordable and specialist housing types/tenures can be achieved.</p>
28	<p>Consider greater assurance./clarity required that specialist housing as required in paragraphs 15-17, can also constitute the affordable housing or employment contribution. Paragraphs 14 and 18 are too ambiguous.</p>	<p>Paragraph 14 addresses the circumstances within which specialist housing is appropriate as a secondary employment use.</p> <p>Paragraph 18 is clear that specialist housing can constitute affordable housing. However, the Council recognises that the needs for specialist housing extend beyond the affordable sector; furthermore the affordable housing required in Shropshire extends beyond specialist housing. Paragraph 18 therefore ensures an appropriate mix of affordable and specialist housing types/tenures can be achieved.</p>

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
29	Consider paragraph 19 , which specifies that over-provision of specialist housing will be a positive consideration when determining if it is appropriate for settlement housing guidelines and/or approximate capacities of sites allocations can be exceeded, is unsound and should be deleted (including because it places further restrictions on sites).	Shropshire Council considers this approach aligned with draft Policy SP7 and the settlement policies in the draft Shropshire Local Plan. However, reflecting wider responses, the Council is proposing a modification to paragraph 19 to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies.
30	Consider support should be provided for open market windfall sites in the countryside that provide more than 20% specialist housing.	The Council considers the mechanisms proposed in this draft Policy effectively support the achievement of the housing needs of older people and those with disabilities and special needs, in a way that aligns with the People’s Strategy for Shropshire. As such, it is not considered necessary to include such a policy which would undermine the wider spatial strategy in the draft Shropshire Local Plan.
31	Consider additional sites should be allocated specifically for specialist housing. Sites promoted for this purpose.	The Council considers the mechanisms proposed in this draft Policy effectively support the achievement of the housing needs of older people and those with disabilities and special needs, in a way that aligns with the People’s Strategy for Shropshire. As such, it is not considered necessary to allocate sites specifically for specialist housing – the Council’s clear preference is for such provision to be integrated into existing and new communities in order to support the achievement of sustainable, inclusive and multi-generational communities.
32	Concern about the ability of proposed allocations in the draft Shropshire Local Plan to comply with proposed requirements in this draft policy and/or the sustainability of specialist housing provision on proposed allocations, due to such reasons as topography and distances from services/facilities. Common sites referenced were BRD030 and MUW012VAR.	Shropshire Council considers the requirements of this policy are achievable on all proposed allocations.

No	Key Issues Raised Including Those of Soundness and Legal Compliance	Shropshire Council Response
33	Concern about reliance on windfall development undermining delivery of specialist housing (references to specific settlements and/or the proposed approach to accommodating the proposed uplift to the housing requirement).	Shropshire Council considers the draft policy provides a range of mechanisms to support provision of accessible and adaptable housing and appropriate forms of specialist housing, to support meeting the housing needs of older people and those with disabilities and special needs. Notably, a number of these mechanisms constitute windfall development opportunities.
34	Query how specialist housing can be provided within rural communities.	Shropshire Council considers the draft policy provides a range of mechanisms to support provision of accessible and adaptable housing and appropriate forms of specialist housing, to support meeting the housing needs of older people and those with disabilities and special needs. Notably, a number of these mechanisms may be appropriate in rural communities.

4. Schedule 2: High-Level Response Summary



Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9
Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A001	B001	General comment	General comment	Not Specified	Not Specified	1. Support proposals for Albrighton. 2. Strongly oppose any proposed developments which fall outside of the scope of this Local Plan.	1 and 2. Noted.	No
A002	B001	General comment	General comment	Not Specified	Not Specified	1. Support proposals for Albrighton. 2. Strongly oppose any proposed developments which fall outside of the scope of this Local Plan.	1 and 2. Noted.	No
A003	B001	Green Belt Topic Paper	Paragraph 7.5	Not Specified	No	1. Paragraph 7.5(a): Agree with housing on ALV006/ALV007 with access off Daddlebrook Road, but there is no evidence to support further sports and recreation provision. Reference to the lack of ability to access leisure facilities in Highley is made, however this is irrelevant as Alveley benefits from more facilities (examples provided), many of which are in proximity of ALB006/ALV007 and are for community sport and recreation, which undermines the need for more. This should therefore just be a housing allocation. 2. Paragraph 7.5(b): Disagree with the proposed allocation ALV009. There is no justification for this proposal and it is not supported by the Parish Council (did not form part of the proposals within their Local Plan). There is already development (6 dwellings) and potential for future development (40 dwellings) in close proximity to the site, on land adjacent to Meadowbrook Close in Alveley, which is contained by housing on three sides, yet is not referenced within the draft Shropshire Local Plan. No need to remove ALV009 from the Green Belt.	1 and 2. No specific changes are proposed to the proposed strategy for Alveley as a result of the additional material that was the subject of this consultation. 1 and 2. ALV006/ALV007 and ALV009 are proposed allocations within the submission version of the draft Shropshire Local Plan and no change is proposed to these allocations through the additional material subject to this consultation. The new Green Belt Topic Paper provides further information on the consideration of alternative options and determination of whether exceptional circumstances exist to justify the proposed removal of sites from the Green Belt. 1 and 2. Shropshire Council considers these proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.	No
A004	B001	General comment	General comment	Not Specified	Not Specified	1. No specific comments, but refer you to Natural England as the Appropriate Nature Conservation Body (ANCB) to consider the documents further.	1. Noted.	No
A005	B001	General comment	General comment	Not Specified	Not Specified	1. Do not consider the Broseley community is materially affected by the proposed policy changes. 2. Note that the Sustainability Appraisal includes updated Stage 3 Site Assessments for the Broseley Place Plan Area, which have not previously been shared and include sites that were not included within the original site assessment. 3. Concerned that there are errors in this site assessment with regard to: BRO031 and BRO032 - in Barrow Parish not Broseley Parish. BRO039 - part of the site has been developed. BRO040 - not allocated for employment development in the Broseley Neighbourhood Plan. BRO043 - not included as a preferred option in earlier stages of plan making. JKD002 - not allocated for employment development in the Broseley Neighbourhood Plan and recently been subject to residential development. JKD003 - not allocated for employment development in the Broseley Neighbourhood Plan but support continued employment use on the site. JKD004 and JKD004VAR - not included as a preferred option in earlier stages of plan making and unaware of location.	1. Noted. No specific changes are proposed to the proposed strategy for Broseley as a result of the additional material that was the subject of this consultation. 2. The site assessment process undertaken by Shropshire Council to inform identification of proposed allocations has formed part of the evidence base and been publicly available during a number of Regulation 18 (plan making) and the Regulation 19 (pre-submission) consultations. It has been reviewed at appropriate stages during the plan making process, to reflect consultation responses and other available information. 3. The location of sites within Stages 2a, 2b and 3 of the site assessment process are identified on an 'interactive map', which forms Appendix U of the Sustainability Appraisal and Site Assessment Environmental Report of the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan (SD006.01). 3. The Council appreciates the comments on specific sites. Having reviewed them, it is not considered that they materially change the outcome of the site assessment.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A006	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report	Paragraphs 5.1 to 5.3; 7.1 (5&6); and Appendix 7	No	No	<p>1. Valid methodology for Sustainability Appraisal (SA) is critical.</p> <p>2. Amended proposals for Much Wenlock fail to recognise or respond to the huge change in suitability and sustainability of sites in the town for significant development - specifically designation as the sole location in Shropshire within a Rapid Response Catchment (rare in the Midlands and Country), presenting the Highest Category of flood risk. This only became evident after the site allocation process began, requiring a need to re-assess suitability. The SA has been updated to consider unmet needs within the Black Country, but not this designation.</p> <p>3. Proposed allocation MUW012VAR has flooded annually since 2018 (photos can be provided) and presents an inevitable risk to neighbouring properties and community safety. This site is unsustainable, especially given its location within a Rapid Response Catchment and the implications of climate change. Astonishing this is not considered in the updated SA.</p> <p>4. Suggestion MUW012VAR could fund flood attenuation is absurd - the ability of the Council to monitor and enforce suitable drainage/attenuation has been undermined by staff cuts; and three significant developments over the past 25 years (Hunters Gate Falcon Court and Callaughtons Ash 2) have demonstrably failed to meet required standards for surface water management, vindicating objectors concerns - expecting a different outcome is reckless. Additionally, proposals to outsource major flood allocation to a developer is entirely unacceptable.</p> <p>5. MUW012VAR is highest quality agricultural land and regularly cultivated. Food security is a key consideration highlighted by war in Ukraine and means the site is unsustainable and inappropriate for development.</p> <p>6. Inappropriate to accommodate unmet needs of the Black Country in the Shropshire administrative area, this should exclusively be at Telford, which was formed specifically to accommodate overflow from Birmingham and the Black Country, benefits from extensive infrastructure (lacking in rural Shropshire) and has extensive areas available for development.</p> <p>7. With regard to Appendix 7 of the SA: -No reference to designation of Much Wenlock as a Rapid Response Catchment. This is inexcusable, fundamentally affects sustainability, means the consideration of individual sites (particularly MUW012VAR) is outdated, and means development levels in the town should be reduced. -No recognition of highway impacts resulting from the early prospect of 1,000 new homes at the Former Ironbridge Power Station (in the Much Wenlock Place Plan Area). This development will initially lack community services, burdening over-stretched traffic and parking infrastructure, increasing congestion, and increasing rat running through narrow streets in the Conservation Area (all pre-existing issues in the town). -Fails to recognise true limitations to availability/reliability of public transport at Much Wenlock. These limitations mean new development will hinder achievement of net zero. -Given flood risk, transport and travel challenges, the possibility of new development in Much Wenlock being sustainable is negligible.</p> <p>8. The consultation is inaccessible to the public. Inappropriate to separate consultation documents and response forms on the website and length and complexity of material off-putting.</p>	<p>1. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.</p> <p>2-5 and 7. No specific changes are proposed to the proposed strategy for Much Wenlock as a result of the additional material that was the subject of this consultation.</p> <p>2, 3 and 7. Shropshire Council is aware of Much Wenlock's rapid response catchment designation, which has been the case for some time. This informed the proposed strategy for Much Wenlock and the site assessment process. The site assessment process undertaken to inform the selection of proposed site allocations is considered proportionate and robust. This process has been informed by specific consideration of flood risk and was directly informed by a Stage 1 and Stage 2 Strategic Flood Risk Assessment.</p> <p>4 and 7. Draft site guidelines for proposed allocation MUW012VAR include very clear expectations for the site to manage flood risk. The Council considers this site provides an opportunity to achieve community benefit, most notably implications for on and off site flood alleviation at Hunters Gate and Forester Avenue.</p> <p>5. The site assessment process undertaken to inform the selection of proposed site allocations is considered proportionate and robust. This process has been informed by specific consideration of agricultural land quality.</p> <p>7. The site assessment process undertaken to inform the selection of proposed site allocations is considered proportionate and robust. This process has been informed by comments from the Council's Highways Officers.</p> <p>6. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>8. The Council acknowledges that the additional SA work subject to this consultation is technical, but this is unavoidable. This SA work seeks to present the assessment processes and conclusions as clearly as possible whilst ensuring compliance with the assessment methodology and relevant legislation. The Council considers the Housing and Employment Topic Paper (also subject to this consultation) summarises key processes and conclusions (including from the SA), clearly and unambiguously.</p> <p>8. The Council considers this consultation is appropriate and consistent with its Statement of Community Involvement and national requirements.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A006	B002	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation	Paragraphs 1, 8, 10 and 17	No	No	<p>1. Policy proposals in paragraphs 1, 8, 10 and 17 are unobjectionable but mere platitudes, given Shropshire's development record and in the context of the proposals in the draft Shropshire Local Plan.</p> <p>2. Much Wenlock is a good example. It has an older demographic than the Shropshire average and is set in a landscape 'bowl', with recent development and proposed allocation MUW012VAR on the furthest 'edge', distant from services and up a steep hill, so older residents will struggle/cannot access services and facilities. The aspirations of paragraphs 1, 8 and 10 have not and will not be observed on MUW012VAR (or other development at Much Wenlock) and the site is unacceptable.</p> <p>3. MUW012VAR and other sites on the edge of the town are subject to severe flooding (it is designated a Rapid Response Catchment). Flood risk is likely to have a greater impact on older residents and those with disabilities and special needs.</p> <p>4. Alternative sites more proximate to services and protected from flood risk by an attenuation pond are available in Much Wenlock. These are better placed to meet the needs of older people and those with disabilities and special needs.</p> <p>5. Beyond doubt even on this limited evidence for a single location, that the draft Shropshire Local Plan is not legally compliant or sound.</p>	<p>1 and 5. Shropshire Council is committed to providing a mix of sizes, types and tenures of housing to meet the needs of different groups in our communities, including older people and those with disabilities and special needs. The intention is that this policy would form part of the draft Shropshire Local Plan. Planning law requires that applications for planning permission be determined in accordance with the adopted Development Plan, unless material considerations indicate otherwise.</p> <p>2. The proposed strategy for the distribution of development seeks to direct development towards those locations with the infrastructure best able to support new development. The site assessment process undertaken to inform the selection of proposed site allocations is considered proportionate and robust. This process has been informed by comments from the Council's Highways Officers and consideration of access to services and facilities.</p> <p>3. The site assessment process undertaken to inform the selection of proposed site allocations is considered proportionate and robust. This process has been informed by specific consideration of flood risk and was directly informed by a Stage 1 and Stage 2 Strategic Flood Risk Assessment.</p> <p>4. Shropshire Council considers that this proposed allocation has been informed by a proportionate and robust site assessment process, which included consideration of reasonable alternatives.</p>	No
A006	B003	Updated Housing and Employment Topic Paper	Paragraphs 1, 4, 16.125, 16.130b, 16.130c and 16.133	No	No	<p>1. Disagree with assumptions in paragraphs 1 and 4 of the updated Housing and Employment Topic Paper.</p> <p>-Incorrect that the duty to cooperate implies a need to accept unmet needs from the Black Country. Telford was established specifically to accommodate unmet needs from Birmingham and the Black Country; much of the brownfield land at Telford reclaimed for this purpose remains available for development; and Telford has the infrastructure and transport links to support development. Consider the unmet needs of the Black Country should be accommodated at Telford.</p> <p>-Disagree that issues raised by the Inspectors can be considered without consideration of other changes recognised since the Draft Local Plan was initially put together. Some of these have been dramatic, including the impact of climate change, which has become more apparent since preparation of the plan commenced and undermines suitability of particular development sites.</p> <p>2. Paragraph 16.125 claims Much Wenlock has a functional relationship with the Black Country, but there is no evidence to substantiate this. There are no public transport or employment links.</p> <p>3. Paragraph 16.130b recognises Much Wenlock is the only Rapid Response Catchment in Shropshire, which is unrecognised in the Sustainability Appraisal (SA). However, fails to recognise the seriousness of this - potentially subject to serious flooding, posing a risk to infrastructure, property, livelihoods and lives and no adjustment; and it does not inform development planning. Consider it is difficult/impossible for development in such locations to be sustainable. Unacceptable to only review relationship to the Black Country, there is also a need to review whether the preferred site in Much Wenlock remains viable and meets local needs (including the needs of older people and those with disabilities and special needs which is a focus in the Much Wenlock Neighbourhood Plan) given its distances from services and risk of flooding.</p> <p>4. Paragraph 16.130c states Much Wenlock is on the A458 corridor, but this is a myth, the road is not recognised or funded by the Department for transport.</p> <p>5. Paragraph 16.133 recognises that the Former Ironbridge Power Station is within the Much Wenlock Place Plan Area. However, there has been inadequate recognition of the pressure this will place on services in Much Wenlock.</p>	<p>1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>2. The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country.</p> <p>3. The site assessment process undertaken to inform the selection of proposed site allocations is considered proportionate and robust. This process has been informed by specific consideration of flood risk and was directly informed by a Stage 1 and Stage 2 Strategic Flood Risk Assessment.</p> <p>4. Strategic corridors were identified within the Shropshire Economic Growth Strategy. Draft Policies SP2, SP12 and SP13 and their explanations of the draft Shropshire Local Plan provide further information on these corridors.</p> <p>5. The Council considers the site assessment process allowed for the consideration of the impact of this proposal on infrastructure. This was complemented by the subsequent planning application process which resulted in the grant of Outline Planning Permission for this development.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A007	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report	S1. Albrighton Place Plan Area	Yes	Yes	<p>1. Policy S1.1 point 2: Support protection of Albrighton's Green Belt to preserve the identity of our village and ensure access to green spaces for young people, families and older people.</p> <p>2. Policy S1.1 point 3: Support allocation of housing in accordance with SAMDev and draft Shropshire Local Plan - recognising the need for housing in the village but at a reasonable volume and on agreed sites.</p> <p>3. Policy S1.1 point 5: Essential any new retail complements the existing high-street, which is the hub of the village.</p> <p>4. Policy S1.1 point 8: Support the three areas of land (non Green Belt) that are part of the longer-term housing plan beyond 2038.</p> <p>5. Paragraph 5.5 - Essential that growth at Albrighton is in keeping with the historic features of the village and Green Belt. Infrastructure is struggling with current demand so cannot support over-development.</p> <p>6. Paragraph 5.10 - Need more one and two-bedroom properties, which are affordable and provide older people the chance to remain in the village and young people the chance to get on the ladder. Do not need more three, four and five-bedroom properties.</p> <p>7. Paragraph 5.12 - Need to ensure that sports and recreational facilities promised as part of the development of site ALB2b (ALB002) in the Albrighton Plan are fulfilled.</p> <p>8. Ensuring development provides supporting infrastructure is critical. Doctor's surgery and pharmacy stretched to breaking point, rail service hit-and-miss; and traffic on roads will soon become incessant if the village is over-developed.</p>	1-8. Noted. Comments relate to draft Policy S1.1 and its explanation within the draft Shropshire Local Plan. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A008	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Updated Additional Sustainability Appraisal Table 12.4 and Appendix 3. Updated Green Belt Topic Paper paragraphs 4.14 to 4.21; 5.23 to 5.27; 6.4 to 6.8; and 6.13. Updated Housing and Employment Paper paragraphs 7.63 to 7.64	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it reflects the views of the local community. It protects our countryside; farms; provides food security; and ensures we maintain biodiversity (essential in this climate emergency). It also defines where development will happen, ensuring housing requirements are met, but ensures no over-development.</p> <p>2. Development proposed is appropriate and meets defined needs, but protects the village and communities. Believe this is the right plan for Albrighton both now and in the future.</p> <p>3. Consider no other sites to those in Table 12.4 of the Updated Additional Sustainability Appraisal should be made available for housing in the draft Shropshire Local Plan.</p> <p>4. Fully support the conclusion in Appendix 3 of the Updated Additional Sustainability Appraisal that Albrighton South sites P36A and P36B as not suitable for development. They should stay as Green Belt and farmers fields. They are near the Boningale Conservation Area and listed buildings.</p> <p>5. Paragraphs 7.63 to 7.64 of the Updated Housing and Employment Paper and paragraphs 4.14-4.21 of the Updated Green Belt Topic Paper: No development should be allowed on Green Belt or areas that are not in the draft Shropshire Local Plan.</p> <p>6. Paragraphs 5.23 to 5.27 of the Updated Green Belt Topic Paper: Safeguarded land should be safeguarded until 2038 and not before.</p> <p>7. Paragraphs 6.4 to 6.8 of the Updated Green Belt Topic Paper: Agree new housing in Albrighton should be built at ALB017 & ALB021. Also agree new employment should be centred on RAF Cosford. Developments in Albrighton need to be phased so Albrighton does not lose its village character.</p> <p>8. Paragraph 6.13 of the Updated Green Belt Topic Paper: Agree there are more appropriate locations than Albrighton to accommodate proposed contributions to unmet Black Country housing needs.</p>	1-8. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

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A009	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14 to 4.21; 5.23 to 5.27; 6.4 to 6.8; and 6.13	Yes	Yes	<p>1. Wholeheartedly support the draft Shropshire Local Plan as it aims to protect our village from over-development by preserving the Green Belt and ensuring thoughtful, controlled growth. It clearly defines the allocated areas for current and future housing which will ensure housing needs are met in Shropshire until 2038.</p> <p>2. Paragraphs 4.14-4.21: -New housing should be built in accordance with the draft Shropshire Local Plan. Sites not included within it should not be developed. -Agree that Black Country housing needs should be accommodated at Tasley (BRD030), Shrewsbury (SHR060, SHR158 & SHR161) and the former Ironbridge Power Station.</p> <p>3. Paragraphs 5.24-5.27: Agree land should be safeguarded for development beyond 2038. However development should not be allowed before then.</p> <p>4. Paragraphs 6.4-6.8: Important to retain the Green Belt around Albrighton (particularly sites P36a and P36b), development upon it should not be supported. Agree with the identification of ALB014; P32a and P35 as safeguarded land to be developed after 2038. New housing should be directed to ALB017 & ALB021. New housing should be phased so the village is not overwhelmed.</p> <p>5. Paragraph 6.13: Albrighton is not the right place for the unmet Black Country housing needs. Agree there are better places in Shropshire for this to occur.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A010	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14 to 4.21; 5.23 to 5.27; 6.4 to 6.8; and 6.13	Yes	Yes	<p>1. Wholeheartedly support the draft Shropshire Local Plan as it aims to protect our village from over-development by preserving the Green Belt and ensuring thoughtful, controlled growth. It clearly defines the allocated areas for current and future housing which will ensure housing needs are met in Shropshire until 2038.</p> <p>2. Paragraphs 4.14-4.21: -New housing should be built in accordance with the draft Shropshire Local Plan. Sites not included within it should not be developed. -Agree that Black Country housing needs should be accommodated at Tasley (BRD030), Shrewsbury (SHR060, SHR158 & SHR161) and the former Ironbridge Power Station.</p> <p>3. Paragraphs 5.24-5.27: Agree land should be safeguarded for development beyond 2038. However development should not be allowed before then.</p> <p>4. Paragraphs 6.4-6.8: Important to retain the Green Belt around Albrighton (particularly sites P36a and P36b), development upon it should not be supported. Agree with the identification of ALB014; P32a and P35 as safeguarded land to be developed after 2038. New housing should be directed to ALB017 & ALB021. New housing should be phased so the village is not overwhelmed.</p> <p>5. Paragraph 6.13: Albrighton is not the right place for the unmet Black Country housing needs. Agree there are better places in Shropshire for this to occur.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A011	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	Approach to the revised housing requirement	No	No	<p>1. Do not challenge the 25,894 dwelling calculation of local housing need.</p> <p>2. The draft Shropshire Local Plan covers the period to 2038, meaning it is unlikely to look ahead 15 years at adoption. Consider this period needs extending to 2040 (assuming adoption in 2025), increasing minimum housing need to at least 28,248. This is necessary given the draft Shropshire Local Plan proposes a high growth strategy above local needs and makes a contribution to unmet needs forecast to arise in the Black Country, which is supported in principle; and would also ensure the draft Shropshire Local Plan is in accordance with para 22 of the National Planning Policy Framework. This has implications for the proposed spatial strategy and strategic distribution of growth, it would also require further Sustainability Appraisal (SA).</p> <p>3. Welcome intention to retain the preferred uplift (15%) above minimum local housing need in the submission version of the draft Shropshire Local Plan. This will, as the Council recognise, help support delivery of family and affordable housing and specialist housing, it will also help foster and support local labour force and wider aspirations for economic growth and productivity.</p>	<p>1. Noted.</p> <p>2, 3 and 4. Shropshire Council considers the proposed plan period addressed within the draft Shropshire Local Plan is appropriate. Importantly: -There is nothing in law requiring a Local Plan to have a minimum 15 year period from adoption. -The National Planning Policy Framework (NPPF) preference for a minimum 15 year period from adoption (paragraph 22) is not a mandatory requirement and shorter timescales can be sound, as established in other Local Plan examinations. The Council considers the primary intention of this preference is to ensure plans are forward-thinking; provide a long-term vision, strategy and basis for sound decision making; and do not unduly restrict growth. This is the case in the draft Shropshire Local Plan, with a spatial strategy underpinned by the principle of 'high-growth'. -The National Planning Practice Guidance (NPPG) on Plan Making</p>	No

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						<p>However, the Council has not considered housing requirement options against the need for the draft Shropshire Local Plan to look ahead at least 15 years from adoption, contrary to national policy. This is a significant flaw and has implications for the proposed spatial strategy and strategic distribution of development - to reject any reasonable alternatives to Option 3b, the Council must demonstrate that looking ahead to 2040 would not support the achievement of sustainable development. Consider further options looking forward to 2040 should be appraised.</p> <p>One option is a High Growth Plus 2024 option of 33,985 dwellings or 1,416 dwellings per annum, consisting of 28,248 dwelling local housing need from 2016-2040; 15% uplift; plus 1,500 dwelling contribution to the Black Country. The annual rate of growth is less than average past completion rates and the annual proposed by the Council. This should form the proposed housing requirement. Recommend the SA and Housing and Employment Topic Papers are revisited to allow consideration of growth options to 2040. Once completed, the updated assessment work should be issued for consultation.</p> <p>4. Object to the use of Option 1, increasing settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement. This is not soundly based or justified and any future windfall development that does come forward should be considered an addition to the overall 'planned' supply. Furthermore the rejection of option 3 increasing site allocation is based on flawed logic. Justification for this position is flawed:</p> <ul style="list-style-type: none"> -The Council consider this is the most sustainable option, however windfall sites are unknown so their sustainability cannot be predicted, as such this conclusion is erroneous and makes no sense. -There is recognition of the 'overlap' in terms of the benefits to Shropshire and the Black Country to be secured resulting from both the uplift to local housing need and the contribution made towards the unmet need respectively. This is particularly relevant when considering the benefits of identifying specific, additional sites to address unmet need, however, the Council make no reference to it. -The Council seem to suggest (para 8.64i) windfall sites provide more certainty of delivery than allocations. This is incorrect, unsubstantiated and erroneous. -The Council is wrongly taking forwards a plan that does not look forwards at least 15 years post adoption. As such it has woefully underestimated the uplift to be accounted for - this should be 3,185 dwellings not 500 dwellings. <p>The Council should therefore identify additional site allocations to address the increased local need and assist in meeting unmet needs of the Black Country. There is a strong case for more growth at Albrighton, acknowledged as a settlement most appropriately located for sustainably delivering a quantum of the unmet needs of the Black County.</p>	<p>addresses the plan period at paragraph 64, indicating that the focus is on ensuring that policies are 'forward thinking' and look over a minimum 15 year period. Again, this is the case in the draft Shropshire Local Plan which addresses a 22 year period and has since submission formed a material consideration in decision making.</p> <ul style="list-style-type: none"> -The proposed plan period continues to align with that of the latter Regulation 18 and Regulation 19 consultations and crucially the submission version of the draft Shropshire Local Plan. -The proposed plan period aligns with the timescales for the proposed vision, objectives, policy framework and settlement strategies within the submission version of the draft Shropshire Local Plan. -The proposed plan period supports the continuation of the spatial strategy proposed within the submission version of the draft Shropshire Local Plan - consistent with the proposed retention of the 1,500 dwelling contribution towards the unmet housing need forecast to arise in the Black Country and the continuation of the 'high-growth' principle that underpins the spatial strategy. -This approach is a pragmatic response to the numerous factors that have had implications for the timescales of the plan making process and meant that adoption of the draft Shropshire Local Plan has not occurred when envisaged by the Council - which would have allowed for more than 15 years remaining within the plan period at adoption. In particular: <ul style="list-style-type: none"> >The Covid 19 pandemic which due to necessary measures to safeguard communities had led to direct delays at key stages in the plan making process; had significant implications on Council resources in order to support the response to the Covid 19 pandemic, leading to delays to the plan making process; and resulted in a specific extension to the timescales for the Regulation 19 consultation. >A number of lengthy and complex objections which required due consideration through the Regulation 19 consultation process and during the ongoing examination processes. This includes a Pre-Action Protocol letter which had a specific implication for the timescales of the examination. -This approach is also a pragmatic approach to avoiding the 'cycle' of examination timescales leading to extensions to plan periods, leading to extension of examination timescales. -This approach is also a pragmatic approach to seeking to positively progress the examination and adoption of the draft Shropshire Local Plan in order to facilitate implementation of the sustainable spatial strategy underpinned by the principle of 'high-growth'. -This approach positively responds to the requirement to review Local Plans every five years. <p>Examples of other circumstances where such an approach has been employed include:</p> <ul style="list-style-type: none"> -The Hart Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraph 32 of their report (published on 10th February 2020), stating: "There has been some suggestion that the Plan period should be extended. The Plan looks forward 13 years after anticipated adoption, which is below the preferred 15 year time period set out in Paragraph 157 of the NPPF. However, the NPPF's preference is not a set requirement and I consider 13 years to be an appropriate time scale in this instance, particularly as there is now a requirement to review plans every five years." Although the NPPF has been revised since the report, Shropshire Council is of the review that the wording relating to the 15 year time period remain largely unchanged. -The Worthing Local Plan, where the Inspector makes specific reference 	

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							<p>to the issue of the Plan period within paragraphs 74-76 of their report (published on 14th October 2022), stating "Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption. As submitted, the Plan period runs from 2020 to 2036. It was anticipated that the Plan would be adopted in 2021 and thus would have met this requirement. The Plan has been prepared during the COVID-19 pandemic, which has had understandable consequences in terms of the preparation and submission of the Plan. This means that the Plan will now be adopted in 2022 and will thus have a lifespan of around 14 years. Although the period will now fall marginally short of the 15 years recommended by the NPPF, I conclude that this does not render it unsound. Delaying the adoption of the plan to address any implications for extending the period would be more likely to frustrate, rather than accelerate the delivery of new housing and employment in Worthing. This would be contrary to the Government's objective of significantly boosting the supply of housing and for Councils to have up-to-date plans in place. On balance, a plan period of up to 2036 would remain broadly consistent with the aims of paragraph 22 of the NPPF in allowing adequate time for the Plan's strategic policies to take effect."</p> <p>4. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>4. The Council considers the SA and planning judgement exercise undertaken are informed by appropriate consideration of relevant matters. It recognises that the specific sites upon which windfall development will occur are not identified (although a range of potential known windfall sites are known). However, it equally recognises that the general location (the range of relevant settlements) are defined. The Council considers the conclusions reached are justified and sound.</p> <p>4. Paragraph 8.64i of the Housing and Employment Topic Paper acknowledges that available information on windfall sites (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities) provide confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement - as such further allocations are not required. It is not stating that windfall sites provide more certainty of delivery than allocations.</p>	

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A011	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	Approach to addressing the Black Country unmet housing need	No	No	<p>1. Do not challenge the inclusion of a 1,500 dwelling contribution to the unmet housing need forecast to arise in the Black Country.</p> <p>2. Support the need to identify specific sites to accommodate the proposed contribution to the Black Country. However, have concerns with the approach utilised to identify the sites proposed:</p> <ul style="list-style-type: none"> -Unclear why certain areas have been selected and others excluded. -The approach includes areas that are not obviously related or connected to the Black Country (i.e. Much Wenlock, Broseley and Highley). -No ranking of the selected areas has been undertaken to determine which perform better - important as the SA indicates that the extent of the functional relationship with the Black Country Authorities varies across various settlements within Shropshire. Without this it is difficult to judge which settlements and sites should be selected to accommodate the proposed contribution. -Consider that Albrighton consistently performs better against factors considered than other settlements. <p>3. Consider functional relationship is the most important factor. Albrighton is clearly relatively well located in comparison with other place areas in terms of its proximity and connectivity (in particular by public transport) to the Black Country and this should be given significant weight in the assessment and selection of specific sites. It follows that Albrighton is a logical choice ahead of other place areas for accommodating the unmet housing need from the Black Country.</p> <p>4. Support Bridgnorth and Shrewsbury largely due to their relative connectivity to the Black Country along a mainline rail route, to fulfil both Shropshire's indigenous needs and an element of the Black Country's needs. However, very unclear why Ironbridge Power Station is selected in preference to other more appropriate locations i.e. Albrighton. No clear basis given as to why any site within the Broseley Place Area, especially the Ironbridge Power Station site, should be preferred to sites located within the Albrighton Place Area for addressing any element of the Black Country's needs. Justification is illogical, confusing and inconsistent with national policy, favouring movement by car than public transport. This proportion of the growth should be assigned to an alternative site.</p> <p>5. Concerned no sites in Albrighton selected to accommodate the proposed contribution to the unmet housing needs forecast to arise in the Black Country. There is a logical economic as well as a sustainability argument for more housing growth in Albrighton and it has a strong functional relationship to the Black Country. This would help to achieve the 'overlap' in strategies highlighted by the Council in terms of supporting the Shropshire Local Plan strategy whilst also supporting the wider needs from the Black Country. This is not considered.</p>	<p>1. Noted.</p> <p>2-5. Shropshire Council considers that a robust and proportionate approach has been undertaken to identify the geography within which reasonable site options to accommodate the proposed contribution to the Black Country could be located. It is notable that within ID37 the Inspectors indicated that they were content with the approach to identifying a reasonable assessment geography. Furthermore, Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.</p>	No
A011	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	Proposed strategic distribution of planned development	No	No	<p>1. Do not object in principle to the continuation of the 'urban focus' approach for the strategic distribution of development or identification of Albrighton as a Key Centre.</p> <p>2. However, amendments proposed to direct part of the proposed contribution to the unmet housing need forecast to arise in the Black Country to the Former Ironbridge Power Station site should not be taken forwards, for reasons documented in other parts of this response (see B002).</p>	<p>1. Noted.</p> <p>2. See the Council's response to A011 - B002.</p>	No

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A011	B004	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	Spatial strategy	No	No	<ol style="list-style-type: none"> 1. The proposed spatial strategy should clarify how the proposed contributions to the unmet needs forecast to arise in the Black Country is to be met through specific allocations. 2. Recommends that specific sites at Albrighton be specifically identified as contributing towards the Black Country's unmet housing need. 3. The overall housing requirement should be modified to 33,985 dwellings, to be delivered over the plan period 2016-2040. 	<ol style="list-style-type: none"> 1. The draft Shropshire Local Plan is intended to be read and applied as a whole. It is considered that the proposed main modifications clearly identify the proposed contribution and the proposed approach to accommodating the contribution to the unmet needs forecast to arise in the Black Country. 2. See the Council's response to A011 - B002. 3. See the Council's response to A011 - B001. 	No

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A011	B005	Additional Sustainability Appraisal and Site Assessments	General comment	No	No	<p>1. None of the reasonable housing requirement options address a plan period looking forward at least 15 years from adoption, contrary to the NPPF. No reasons have been presented by the Council that demonstrate why it would be inappropriate to consider options that look forward over a 15 year period. As such, the Council should appraise reasonable alternatives that are consistent with national policy. One suitable alternative is high growth plus 2024. See A011 - B001 for further details.</p> <p>2. Object to the proposed approach to accommodating the uplift to the proposed housing requirement. The Council do not explain the criteria or assumptions that have been used to inform their application of planning judgment as a basis for the scoring in the SA or summary Table 10.5. Paragraph 10.60 of the additional Sustainability Appraisal (SA) work highlights 'deliverability' as key, but it is not explained how this is taken into account. Taken together, the lack of clarity regarding how these three options have been appraised undermines the credibility of the overall SA process. See A011 - B001 for further details.</p> <p>3. Agree Shropshire should make a contribution towards unmet needs forecast to arise in the Black Country and is suitably placed to accommodate and deliver such contributions in a manner that can also achieve sustainable patterns of growth. Have concerns with the approach to site selection, in particular inclusion of the Former Ironbridge Power Station and exclusion of any sites at Albrighton. This includes the Land at Cross Road, Albrighton (ALB014). See A011 - B002 for further details.</p> <p>4. Table 12.4 of the additional SA work demonstrates the Council accepts at the outset that Ironbridge Power Station performs poorly with regards to wider sustainability objectives and contributing towards the unmet housing need from the Black Country. Reference to the potential for a railway station is included in the site assessment, but there is no evidence any such proposals have been devised/advanced. Reality is that the vast majority of travel movements between the site and the Black Country would involve private car journeys. This promotes unsustainable patterns of development and would not lead to the effective integration of homes and public transport provision. This site could meaningfully contribute towards Shropshire's indigenous housing needs, but we would respectfully request the removal of this site from those sites specifically identified as contributing towards the Black Country's needs. The 600 dwellings assumed at the site should be reassigned to other, suitable sites that do have a functional relationship and significantly better connectivity to the Black Country, notably at Albrighton.</p> <p>5. Recommend consideration of site ALB014 - Land at Cross Road, Albrighton which offers clear potential to support and promote sustainable movement patterns for all travellers, given its proximity to the main east-west rail line that links Shropshire to the Black Country, which accords with national policy. The Council also accepts exceptional circumstances exist to justify safeguarding the site from the Green Belt for future development. The additional SA work recognises the village has a strong functional relationship to the Black Country and could be suitably located to accommodate some of the proposed contribution to the unmet development needs forecast to arise within the Black Country, this is reflected in its overall 'good' score in the SA. The Council's reasoning indicates there are other 'more appropriate sites', strongly disagree with this position. The Former Ironbridge Power Station achieves a poor score in the SA, has a significantly weaker relationship both in terms of its proximity and connectivity to the Black Country, and would result in unsustainable travel patterns based largely on the private car.</p> <p>Taken together, it is both logical and reasonable that the Land at Cross Road, Albrighton should be specifically identified (and allocated) in preference to the Ironbridge Power Station site towards meeting a proportion of the unmet housing need from the Black Country.</p>	<p>1-2. See the Council's response to A011 - B001. 3-5 See the Council's response to A011 - B002.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A011	B006	Updated Green Belt Topic Paper.	General comment	No	No	<p>1. Inspector's advice did not preclude release of Green Belt land to accommodate proposed contributions to unmet needs forecast to arise in the Black Country and it is noted that one of the four sites the Council proposes for this purpose is within the Green Belt (at Shifnal to accommodate all 30ha of the proposed employment land contribution).</p> <p>2. Land in eastern Shropshire is appropriate to accommodate proposed contributions to the unmet needs forecast to arise in the Black Country, as it is relatively well-located and connected to the Black Country compared to other parts of the plan area. However, the Council has discounted completely any sites currently in the Green Belt (including all sites at Albrighton which is the most sustainably connected settlement to the Black Country in Shropshire, located on the main rail line to Wolverhampton and beyond) to accommodate the unmet housing needs from the Black Country. The Council's decision to exclude Albrighton sites as contributing towards the unmet housing needs from the Black Country is illogical and undermines the wider achievement of sustainable patterns of growth and the integration of housing and public transport objectives, as required by national policy. These constitute exceptional circumstances to justify the release of Green Belt land at Albrighton.</p> <p>3. Shropshire has a history of utilising safeguarded land and it is imperative that the most sustainable settlements within the Green Belt are maintained consistent with national policy on maintaining the vitality of sustainable rural settlements. The Council recognise proposed allocations exhaust remaining safeguarded land at Albrighton and as such propose three areas of land to be removed from the Green Belt and 'safeguarded'. Agree that exceptional circumstances do exist, but consideration should be given to the functional relationship Albrighton has to the Black Country as an exceptional circumstance.</p> <p>4. Broadly agree in principle that exceptional circumstances exist to justify release of proposed safeguarded land ALB014 from the Green Belt. However, consider the site should be allocated for residential development, recognising the contribution it can make to the unmet housing needs of the Black Country. Justification for not selecting the site is contradictory. It references settlement size, but the assessment for ALB014 says it is of sufficient scale to accommodate a meaningful contribution. It also references more appropriate locations, but consider the Former Ironbridge Power Station site which is identified has a much weaker relationship and connectivity to the Black Country compared to Albrighton. The Council argues promoting sustainable patterns of development and not restricting the potential for more growth in Albrighton in the future constitutes an exceptional circumstance for safeguarding of this site, agree but this factor seems to have been ignored when considering Albrighton as a potential location to accommodate the unmet housing need from the Black Country. This is another example of the confusing and illogical nature of the Council's updated evidence. Again, the Council's stance is erroneous and lacks credibility - it ignores evidence regarding the functional relationship of Albrighton to the Black Country.</p>	<p>1. Noted.</p> <p>2 and 4. Shropshire Council considers that a robust and proportionate approach has been undertaken to identify the geography within which reasonable site options to accommodate the proposed contribution to the Black Country could be located. It is notable that within ID37 the Inspectors indicated that they were content with the approach to identifying a reasonable assessment geography. Furthermore, Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>3 and 4. Shropshire Council considers the Updated Green Belt Topic Paper and associated evidence documents summarise the Council's consideration of alternative options to Green Belt release at Albrighton for development beyond the proposed plan period and the exceptional circumstances identified to support the release of land from the Green Belt at Albrighton to be safeguarded for future development.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A011	B007	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comment	No	No	<p>1. Whilst there may exist an in-principle need for specialist housing in Shropshire, national policy nonetheless makes clear that policies should not undermine deliverability of the plan. The policy wording and the supporting text does not point to any specific evidence which has tested the viability implications of the specific standards proposed. This is relevant because the Council accepts that specialist housing provision must remain affordable to occupants. Object to the draft policy on the grounds that it is not sufficiently evidenced and is inconsistent with national policy. Specifically, it fails to acknowledge that the provision of specialist housing is likely to impact on the viability of development where such provision is sought, in terms of accessibility, adaptability, as well as potential financial implications for developers and those occupying the units whose needs are intended to be met.</p> <p>2. The draft policy focuses almost entirely on setting standards for provision of specialist housing. However, it provides no advice to applicants on how viability considerations are to be taken into account, as required in national policy. Object to the draft policy on the grounds that it provides no guidance for applicants or decision-makers when viability considerations do come to light or how such considerations are to be taken into account.</p>	<p>1 and 2. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Furthermore, within paragraphs 38-41 ID28 the Inspectors concluded that there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. Reflecting these factors, it is considered appropriate to specify the proportions of specialist housing expected on larger development sites.</p> <p>To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken.</p> <p>With regard to the optional building regulations accessible and adaptable housing standards, the proposed standards for general housing are specifically considered within the Whole Plan Viability Assessment. With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes that such housing will be "subject to a viability assessment at the point of a planning application", consistent with national guidance.</p> <p>The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations. However, the Council recognises that viability can vary between the different forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution which is responsive to needs and development viability.</p> <p>It is also important to note that many forms of specialist housing represent high-density development and as such can achieve effective use of land enhancing viability, may also constitute a proportion of the affordable housing contribution, and also represents an additional outlet on the scheme, which can increase the sites marker, have positive effects on deliverability, and speed-up timescales - which aligns with Government aspirations.</p> <p>However, it is acknowledged that there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such, the Council is proposing a modification to this draft Policy to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies.</p> <p>Furthermore, consistent with the conclusions of the Whole Plan Viability Assessment a modification is proposed to allow the provision of reduced rates of specialist housing provision where it is demonstrated that this is creating viability concerns for otherwise sustainable schemes.</p> <p>Furthermore, it is recognised that there may be circumstances where a specific site is unsuitable for specialist housing or there is no identified need for such housing in the area; as such the Council proposes a modification to this draft Policy to allow for the provision of reduced rates of specialist housing provision where the Council agrees one or both of these circumstances apply.</p>	Yes

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A012	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65; Table 8.1 and Table 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Fully support the draft Shropshire Local Plan. The people of Albrighton have been consulted and future development has been considered so not to impact on village life or affect Green Belt land. It has also considered the needs of the Black Country and provided sites within Shropshire which are local to the Black Country to ensure that it can meet its needs.</p> <p>2. Paragraphs 12.1-12.3 of the additional Sustainability Appraisal (SA) illustrate consideration of sites suitability to accommodate local needs/Black Country contribution and conclusions regarding those sites to accommodate contributions to the Black Country. Consider most appropriate sites have been identified at Tasley, Shrewsbury & the Former Ironbridge Power Station. Also agree with conclusion in paragraph 6.13 of the Green Belt Topic Paper, that Albrighton is not the right place to accommodate proposed contributions to the Black Country.</p> <p>3. Table 12.4 of the additional SA work illustrates 2 sites at Albrighton (ALB017 & ALB021) are proposed for housing development. Paragraphs 4.14-4.21 of the Green Belt Topic Paper demonstrate the work undertaken to inform these sites. Therefore no other sites should be included. Green Belt land should not be targeted for development in this plan but a sustainable approach provided for the future.</p> <p>4. The conclusion in Appendix 3 of the additional SA work that Albrighton South sites P36A & P36B should not be built on is important. These sites are Green Belt and should remain as such; it is also near to listed buildings and a conservation area which would be threatened by development of this scale; as such the promoters should not be allowed to develop it.</p> <p>5. Paragraphs 7.63-7.64, 8.7-8.8 and Tables 8.1 & 8.3 of the Housing and Employment Topic paper demonstrate the community are not against development & there are 500 houses planned up to 2038 (including the ongoing Millfield's development and proposed allocations ALB017 & ALB021). But it is a rural village and farming within the Green Belt, providing local produce key to sustainability of the local area, with conservation areas and thriving wildlife habitats and biodiversity - to lose this would change the area not for the better. As the Millfield's development is large in the context of Albrighton, ALB017 & ALB021 should be built steadily over a 10 year period.</p> <p>6. Agree that land should be safeguarded for development after 2038 at Albrighton as specified in paragraphs 5.24-5.27 of the Green Belt Topic Paper, but not before.</p> <p>7. With regard to paragraphs 6.4-6.8 of the Green Belt Topic Paper, it is important that Green Belt land around Albrighton is kept clear of housing, and employment for the town be based at RAF Cosford. Development in Albrighton must take into account its rural nature & ensure that it is phased in appropriately.</p>	1-7. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A013	B001	General comment	General comment	Not Specified	Not Specified	1. Clive Barracks, Tern Hill is a proposed allocation within the draft Shropshire Local Plan. This proposal is supported, the role of the site in the delivery of housing and employment during the proposed plan period and beyond is recognised and remain fully committed to delivery.	1. Noted. No specific changes are proposed to the proposed strategy for Clive Barracks, Tern Hill as a result of the additional material that was the subject of this consultation.	No
A013	B002	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comment	Not Specified	No	<p>1. Consider the draft policy could be simplified and made more concise. Operation of the Policy relies upon a number of interconnected criteria which means the implications of the policy may not be readily apparent.</p> <p>2. Query whether criterion 1 is suitable policy, would be better as part of the justification.</p> <p>3. No objection to criterion 2 in isolation. However, concerned how this forms a policy requirement later in the Policy.</p> <p>4. Criterion 3 is confusing and interaction with requirements in criterion 15, 16 and 17 is unclear. Does specialist housing for older people and/or those with disabilities and special needs if delivered at M4(3) standard count for the purposes of the M4(3) and M4(2) provision, thus reducing the need for M4(3)</p>	<p>1. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.</p> <p>2. Shropshire Council considers criterion 1 of the draft Policy is appropriate. It establishes the need to provide accessible and adaptable housing and appropriate forms of specialist housing and the basis for subsequent policy requirements.</p> <p>3. Noted. Shropshire Council acknowledges the requirements of paragraphs 2 and 7 are comparable and as such is proposing a main modification (deletion of paragraph 2) in response.</p> <p>4. The draft policy introduces a range of mechanisms to meet the</p>	Yes

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						<p>provision entirely and the M4(2) provision down to 55% of the remaining properties, or does criterion 3 only apply to market housing?</p> <p>5. Concede there is likely some justification for an uplift in M4(2) and M4(3) standards in Shropshire, but do not believe a requirement for 75% of new homes to be delivered to these standards has been adequately justified. The draft policy specifies need for such housing is identified in the SHMA, however evidence contained in Table 94 and paragraphs 6.290-6.292 of the SHMA point to a lower need. Furthermore:</p> <ul style="list-style-type: none"> -Potential national changes to building regulations are not sufficient justification. -The SHMA includes a range of needs for M4(2) and M4(3) housing, which also reduces to account for the potential to adapt existing housing to M4(1) standard. This is a logical step not reflected in the policy requirement, as such there is an inconsistency between this approach/this requirement and the often referenced aspiration of the People's Strategy to support people to remain independent in their own homes. -The proposed approach means new development disproportionately meets the district's M4(2) and M4(3) needs, much of which is already existing. New development is generally expected to resolve issues generated by itself, not pre-existing shortfalls or issues not directly related to development. -Unlikely 75% of purchasers of new homes will be older people or those with disabilities - many of which will wish to remain in their own homes as acknowledged by the Council. This policy is therefore likely to over-supply the market, particularly as the Council is also seeking more specialist housing. -Provision of M4(2) and M4(3) housing has unintended consequences, including costs. These will result in higher build costs and whilst that may be absorbed by the landowner, given how competitive the housing land market is currently, it may also be partially passed to house buyers. Thus, people with no need for M4 housing, may end up paying a premium for it to be delivered. -As such, consider this requirement should be reduced to levels consistent with that initially suggested in the SHMA (Paragraph 6.290), with higher delivery an optional/aspirational target for developers to consider on a site by site basis. Also consider irrespective of the level required, that flexibility for negotiation based on a range of factors, particularly geographic (aligning with paragraphs 10, 11 and 18 of the policy explanation), should be provided. <p>6. Provision of a footnote linking Criteria 5, 6 and 7 to paragraphs where Dementia Friendly Housing can be found may improve legibility of the policy.</p> <p>7. No issue with the aim and intent of Criterion 9, but query whether there may be an operational need for some facilities to be gated off (security, health and safety reasons for residents), and such allowances should be enabled.</p> <p>8. With regard to specialist housing, the Council does not appear to have undertaken analysis of the potential yield of specialist care through the proposed policy and tested this against need. There has also been no analysis of the potential for specialist housing brought forward separately from strategic residential housing sites. Whilst there is clearly a need for increased specialist housing, the Council have not adequately justified the proposed approach and thresholds.</p> <p>9. Do not support proposals of criterion 15, 16 and 17:</p> <ul style="list-style-type: none"> -The various typologies (50-150, 150-250 and 250+ dwellings) do not directly relate to meeting any need and are not formed by any obvious evidence. - Not clear whether viability implications of this approach have been adequately explored and national guidance is clear that the viability of such policy requirements should be demonstrated by the LPA in evidence before being requested through a planning policy. -The approach disproportionately impacts larger development, but larger schemes would by definition deliver larger quantities of specialist homes even if at the same rate. Justification relates only to viability, but this is not founded in 	<p>housing needs of older people. However, Shropshire Council considers that the interaction between these different mechanisms and in particular criterion 3 and criteria 15, 16 and 17 of the draft Policy is clear. Specialist housing is a form of housing and all housing that achieves M4(2) and M4(3) standards within a development count towards the required standards within criterion 3 of the draft Policy.</p> <p>5. The Strategic Housing Market Assessment (SHMA) identifies that growth in the number of older persons' households is a key feature in the population and household change projected to occur in Shropshire over the Local Plan period from 2016 to 2038. It calculates a total need for M4(2) and M4(3) housing equivalent to 77% of total household growth (of which M4(3) constitutes around 13%). It is recognised that part of this need can be met within specialist accommodation, however Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible. As such Shropshire Council considers the SHMA justifies requirements for all housing specifically designed for the elderly to achieve M4(3) standard and the proposed thresholds for M4(2) and M4(3) standard dwellings on sites of 5 or more dwellings.</p> <p>6. The explanation to the draft policy provides information on dementia friendly housing.</p> <p>7. Shropshire Council recognises some specialist housing may have specific security and operational requirements. However, it is considered these can be achieved whilst ensuring it integrates into rather than being gated-off from existing and new communities.</p> <p>8 and 9. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. It also identifies a significant need for specialist housing in order to maintain existing prevalence rates. As such, it is considered essential that the housing provided is responsive to the needs of the older people within our communities.</p> <p>8. The Council has considered various mechanisms to support the delivery of specialist housing for older people. Those considered appropriate are addressed within this draft Policy. For the avoidance of doubt, the provision of specialist housing on large development sites is one mechanism proposed (also offering the ability to ensure the creation of multi-generational and inclusive communities); other mechanisms proposed include windfall development within settlements; specialist housing which complies with the definition of affordable housing as a form of exception development; and specialist housing which constitutes Use Class C2 development on mixed-use employment sites as a secondary employment use (where consistent with relevant policies of the draft Shropshire Local Plan). The Council considers these mechanisms will support the delivery of the right size, type and tenure of specialist housing to support meeting the housing needs of older people and those with disabilities and special needs.</p> <p>9 and 10. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Furthermore, within paragraphs 38-41 ID28 the Inspectors concluded</p>	

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						<p>evidence. Whilst delivery at scale can have cost and efficiency benefits, the infrastructure burden may increase significantly for strategic schemes.</p> <p>-Implications of specialist housing on levels of affordable housing required are unclear. Viability implications of this require consideration.</p> <p>-The policy is silent on circumstances where a suitable specialist housing provider does not come forward on a marketed site. The Policy should be clear if there is to be any requirement for such provision, that it can be transferred to other residential uses in the event that there is no interest in the site after 6 months of marketing.</p> <p>-Other mechanisms to deliver specialist housing (like on designated employment land as also proposed by the site) should be considered.</p> <p>-The Council should focus on encouraging younger people into the area to ensure continued effective operation of the economy in terms of labour availability and retention of balanced communities.</p> <p>-Latent market demand for such accommodation may mean it increasingly forms an element of larger developments, but the Council has not adequately justified this policy requirement in terms of need and viability. Nor is it clear it will be effective given geography of effected sites/need.</p> <p>10. Consider Clive Barracks is viable, but the impacts of this new requirement have not been fully tested and explored. Requirement to deliver a potentially substantial structure will have masterplanning and land take issues which again need further exploration. The Council stated specialist housing is required in places where people live to allow them to stay in existing communities, but Clive Barracks represents a new community, thus this impetus does not exist. A critical mass of family housing is required to support the school proposed on the site, which may be affected by this policy. If the policy is found sound, the site specific policy for Clive Barracks should be clear it does not apply to the site.</p>	<p>that there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. Reflecting these factors, it is considered appropriate to specify the proportions of specialist housing expected on larger development sites.</p> <p>To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken.</p> <p>With regard to the optional building regulations accessible and adaptable housing standards, the proposed standards for general housing are specifically considered within the Whole Plan Viability Assessment.</p> <p>With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes that such housing will be "subject to a viability assessment at the point of a planning application", consistent with national guidance.</p> <p>The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations. However, the Council recognises that viability can vary between the different forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution which is responsive to needs and development viability.</p> <p>It is also important to note that many forms of specialist housing represent high-density development and as such can achieve effective use of land enhancing viability, may also constitute a proportion of the affordable housing contribution, and also represents an additional outlet on the scheme, which can increase the sites marker, have positive effects on deliverability, and speed-up timescales - which aligns with Government aspirations.</p> <p>However, it is acknowledged that there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such, the Council is proposing a modification to this draft Policy to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies.</p> <p>Furthermore, consistent with the conclusions of the Whole Plan Viability Assessment a modification is proposed to allow the provision of reduced rates of specialist housing provision where it is demonstrated that this is creating viability concerns for otherwise sustainable schemes.</p> <p>Furthermore, it is recognised that there may be circumstances where a specific site is unsuitable for specialist housing or there is no identified need for such housing in the area; as such the Council proposes a modification to this draft Policy to allow for the provision of reduced rates of specialist housing provision where the Council agrees one or both of these circumstances apply.</p>	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A013	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comment	Not Specified	Not Specified	<p>1. Support publication of this necessary evidence to safeguard the draft Shropshire Local Plan. The Inspector's commentary correctly notes that there had likely been a failing to adequately test the proposed contributions (and reasonable alternatives) to the Black Country's unmet needs through the SA process.</p> <p>2. Support the approach adopted by the Council to the SA testing of the delivery of unmet need is recognised.</p> <p>3. Support the updated document and hope it assists the Examination proceed to a timely and robust resolution.</p> <p>4. The SA assesses site allocations, but updates appear to relate solely to additional criteria which test a sites suitability to accommodate proposed contributions to the Black Country. Consider the assessment of the Clive Barracks, Tern Hill is unduly negative and incorrect in respect of criteria relating to Ancient Woodland; Local Wildlife Sites; and accessibility of open space. As a result the site should receive a higher overall score reflecting its suitability for allocation.</p> <p>5. Support the scoring of Clive Barracks, Tern Hill for both housing and employment in the context of the settlement and Black Country. The site remains eminently suitable to meet the needs arising within Shropshire.</p>	<p>1-3 and 5. Noted.</p> <p>4. The site assessment process undertaken to inform the selection of proposed site allocations is considered proportionate and robust.</p> <p>5. National Planning Policy Framework paragraph 186c gives national protection to Ancient Woodland so the Council considers the score for Ancient Woodland on this site be correct. The Council also considers the score for the nearby Wildlife Sites to be correct – the River Tern and R.A.F. Tern Hill Wildlife Sites are adjacent to the site boundary and in the case of R.A.F. Tern Hill partly within the site. Additionally, the Council's Open Space Assessment does not indicate the presence of a children's playground, outdoor sports facility, amenity green space or accessible green space within the site. Developer's proposals to retain or provide facilities can only be considered at the planning application stage when the details of a proposal are known.</p>	No
A013	B004	Updated Housing and Employment Topic Paper	General comment	Not Specified	Not Specified	<p>1. Support the Council's approach to Clive Barracks, Tern Hill.</p> <p>2. Given the geographic location of Clive Barracks, Tern Hill in relation to Tasley Garden Village, Bridgnorth; Land between Mytton Oak Road and Hanwood Road, Shrewsbury and the Former Ironbridge Power Station; support the conclusion that it is not identified to accommodate part of the proposed contribution to the unmet needs forecast to arise in the Black Country.</p> <p>3. Support the Council's delivery assumptions for Clive Barracks as set out at Table 8.1 of the Topic Paper, particularly identification of 350 dwellings to be delivered within the Plan period. Work is ongoing as to the full capacity of the Clive Barracks site, including whether additional growth above 750 dwellings can be achieved, having regard to matters such as BNG for example. Such additional delivery, if achievable, would not alter the in-plan delivery and thus is not material for this examination.</p>	<p>1-3. Noted. No specific changes are proposed to the proposed strategy for Clive Barracks, Tern Hill as a result of the additional material that was the subject of this consultation.</p>	No
A013	B005	Updated Green Belt Topic Paper.	General comment	Not Specified	Not Specified	<p>1. No specific comments.</p>	<p>1. Noted.</p>	No
A014	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comment	Yes	No	<p>1. Support the principle of this policy, but consider it is overly prescriptive and inflexible. It needs to be reconsidered to ensure consistency with paragraph 86 of the National Planning Policy Framework (NPPF) - flexible to accommodate unanticipated needs and allow rapid response to changing economic circumstances. Setting out minimum housing requirements may risk providing the wrong type of housing for residents, fail to recognise housing needs vary by area/site, and potentially impacts on development viability and delivery.</p> <p>2. Instead, the policy should require applicants to consider latest housing need evidence to inform the mix and type of housing proposed, whilst also considering the suitability of the site for specialist housing. It must also ensure development viability and achieve an appropriate housing mix for the site/area.</p> <p>3. Specific policy requirements (e.g. dementia friendly design) needs to be supported by reference to supporting documents (e.g. GC26). Currently the policy is too vague.</p> <p>4. The document is referenced as an appendix, it should form part of the draft Shropshire Local Plan itself.</p>	<p>1 and 2. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Furthermore, within paragraphs 38-41 ID28 the Inspectors concluded that there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. Reflecting these factors, it is considered appropriate to specify the proportions of specialist housing expected on larger development sites.</p> <p>To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken.</p> <p>With regard to the optional building regulations accessible and adaptable housing standards, the proposed standards for general housing are specifically considered within the Whole Plan Viability Assessment.</p> <p>With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes that such housing will be "subject to a viability assessment at the point of a planning application", consistent with national guidance.</p>	Yes

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
							<p>The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations. However, the Council recognises that viability can vary between the different forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution which is responsive to needs and development viability.</p> <p>It is also important to note that many forms of specialist housing represent high-density development and as such can achieve effective use of land enhancing viability, may also constitute a proportion of the affordable housing contribution, and also represents an additional outlet on the scheme, which can increase the sites marker, have positive effects on deliverability, and speed-up timescales - which aligns with Government aspirations.</p> <p>However, it is acknowledged that there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such, the Council is proposing a modification to this draft Policy to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies.</p> <p>Furthermore, consistent with the conclusions of the Whole Plan Viability Assessment a modification is proposed to allow the provision of reduced rates of specialist housing provision where it is demonstrated that this is creating viability concerns for otherwise sustainable schemes.</p> <p>Furthermore, it is recognised that there may be circumstances where a specific site is unsuitable for specialist housing or there is no identified need for such housing in the area; as such the Council proposes a modification to this draft Policy to allow for the provision of reduced rates of specialist housing provision where the Council agrees one or both of these circumstances apply.</p> <p>3. The Council considers that the requirements of this policy, supported by the associated explanation, are clear. With specific regard to dementia friendly housing, further information and a link to GC26 are provided within the explanation of the policy.</p> <p>4. The document formed an appendix to the Council's response to ID28. It is intended to form a policy within the draft Shropshire Local Plan. This is reflected within the updated Schedule of Proposed Main Modifications.</p>	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A014	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comment	Yes	No	<p>1. The Inspector's have found the Council's approach to identifying housing and employment land needs for Shropshire sound, including providing for 1,500 homes and 30ha of employment land towards the Black Country unmet need. However, do not consider the overarching calculation of unmet need in the Black Country accurate - it was based on the 2018 Strategic Growth Study, and has worsened since (reference to the "Falling Even Shorter" report (Appendix 1) of this response). Agreement on this contribution also pre-dates the examination. Consider further discussions should occur with neighbouring authorities in addressing this serious housing shortfall and agreeing an increase in the contribution to be provided, prior to Stage 2 hearings.</p> <p>2. Consider the proposed contribution to the unmet needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) are disproportionately small, given the significant need demonstrated by the "Falling Even Shorter" report (Appendix 1) of this response and the functional links Shropshire has to the Black Country. There is scope to provide for additional needs in sustainable locations and early in the plan period, such as on ALB015.</p>	<p>1 and 2. Noted. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>1 and 2. Shropshire Council would note that the Planning Inspectors concluded in ID28 that they "...are satisfied that the Council has met the legal duty set out in Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), in so far as it imposes a duty on a local planning authority to co-operate..."</p>	No
A014	B003	Updated Housing and Employment Topic Paper	General comment	Yes	No	<p>1. Consider reliance on settlement guidelines/windfall allowances and increased capacity of strategic allocations (Option 1) to accommodate the proposed uplift to the housing requirement, is not the most appropriate or sustainable way of planning for additional growth as over reliance on windfall allowances does not reflect positive and proactive planning.</p> <p>2. A more appropriate approach would be allocating additional sites (Option 3). This constitutes proactive planning, allows identification of the most sustainable locations for development, and ensures the draft Shropshire Local Plan is prepared positively. Such allocations should be distributed across appropriate sites on the edge of a number of sustainable settlements, instead of just two, to avoid undue pressure on them whilst supporting the sustainability of smaller settlements and so as not to undermine delivery of affordable housing, maximising viability/vitality of existing services and alleviating housing need. Albrighton is a highly sustainable location for housing growth and sites such as ALB015 (Land Off Sandy Lane, Albrighton), would be available early in the plan period and could provide a substantial proportion of the additional requirement identified.</p> <p>-Regulation 19 submission of respondent, appended to support response. This includes site promotion/supporting information related to ALB015; a technical review of the need for housing in Albrighton; and an overview of how ALB015 achieves the Shropshire Test.</p> <p>3. Given the potential for delays to delivery for large strategic sites and the significant amount of infrastructure required to serve development, increasing capacity on the Former Ironbridge Power Station is not considered appropriate to meet these additional needs.</p>	<p>1-3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A014	B004	Updated Green Belt Topic Paper.	General comment	Yes	No	<p>1. Within ID28 the Inspectors noted providing contributions to the unmet needs of the GBBCHMA would require the release of Green Belt land, given the Council have also proposed the release of Green Belt land to meet their own needs.</p> <p>2. The proportion of growth identified for Albrighton, a “Key Centre”, is not considered reflective of the sustainability of the settlement, availability of local services and amenities, proximity to employment opportunities (particularly compared with other settlements), and functional links to the Black Country. Growth should be distributed to ensure long-term vitality of settlements and allow sustainable growth. Consider additional growth should be allocated to Albrighton (as a minimum this should constitute proposed safeguarded land) and include ALB015 for around 220 market and affordable dwellings.</p> <p>3. Given the serious shortfall of housing across the Black Country (see Appendix 1 of the response), consider additional sites in sustainable “Key Centre” settlements, such as Albrighton, located in close proximity to where the Black Country need arises and identified as one location where it maybe appropriate to accommodate proposed contributions to the Black Country, would be well placed to provide for additional growth (whilst concerns are expressed about its size/capacity by the Council, it is a sustainable settlement).</p> <p>-Regulation 19 submission of respondent, appended to support response. This includes site promotion/supporting information related to ALB015; a technical review of the need for housing in Albrighton; and an overview of how ALB015 achieves the Shropshire Test.</p>	<p>1-3. Shropshire Council considers that the proposed development strategies for Albrighton is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations and areas of safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p> <p>1-3. Shropshire Council considers that a robust and proportionate approach has been undertaken to identify the geography within which reasonable site options to accommodate the proposed contribution to the Black Country could be located. It is notable that within ID37 the Inspectors indicated that they were content with the approach to identifying a reasonable assessment geography. Furthermore, Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.</p>	No
A015	B001	Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8	Yes	Yes	<p>1. Understand the need to build more housing in a measured and contained way, so approve the proposals in the draft Shropshire Local Plan, which promises to control future planning decisions, whilst protecting Green Belt.</p> <p>2. Proposals to build 800 houses+ on the outskirts of Albrighton will be wholly detrimental to the village, destroying the essence and heart of the community, as well as removing highly valued agricultural and Green Belt land.</p> <p>3. Note the draft Shropshire Local Plan includes three safeguarded green belt areas that may be used for further development after 2038, these potential sites should be sufficient for future growth in this area.</p>	<p>1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A016	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65; Table 8.1 and Table 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan proposals for Albrighton. The draft Shropshire Local Plan is consistent with national policy and ensure achievement of housing needs to 2038.</p> <p>2. In paragraphs 12.1-12.3 of the additional Sustainability Appraisal (SA) work and paragraphs 5.24-5.27 / 6.4-6.8 of the Green Belt Topic Paper, Shropshire Council are right to decide the best place for the 'Black Country need' houses are in Tasley, Shrewsbury and the Former Ironbridge Power Station site. Agree with paragraph 6.13 of the Green Belt Topic Paper that Albrighton is not the right place to accommodate proposed contributions to the Black Country.</p> <p>3. Tables 8.1 and 8.3 of the Housing and Employment Topic Paper and Table 12.4 of the additional SA work demonstrates proposals for 500 dwellings in Albrighton to meet current and future needs, including existing and proposed allocations (which should be built over a 10 year period and following this there should be less development in the village up to 2038). With regard to paragraphs 8.7-8.8, Albrighton is surrounded by Green Belt which provides environmental and economic benefits. As such, proposals for development in the Green Belt should be refused and no other sites should be made available for housing in Albrighton, especially in the Green Belt or for the 'Black Country'.</p> <p>4. Sites P36a and P36b at Albrighton have been assessed within Appendix 3 of the additional SA work and it was correctly concluded they should not be developed. They are and should remain in the Green Belt; are near listed buildings and a conservation area; distant from Albrighton centre; unsuitable for housing; would cause major infrastructure problems; and there are adequate other development sites.</p> <p>5. Support conclusion in paragraphs 7.63-7.64 of the Housing and Employment Topic Paper to increase the housing requirement by 500 dwellings, which demonstrates an understanding of the need for housing, but that this needs to be proportionate and planned.</p> <p>6. With regard to paragraphs 4.14-4.21 of the Green Belt Topic Paper, consider extensive work has been put into the draft Shropshire Local Plan and it should be 'stuck to'.</p> <p>7. Agree land should be safeguarded for development after 2038 at Albrighton as specified in paragraphs 5.24-5.27 and 6.4-6.8 of the Green Belt Topic Paper, but not before.</p> <p>8. With regard to paragraphs 6.4-6.8 of the Green Belt Topic Paper, it is important that Green Belt land around Albrighton is kept clear of housing and employment (which should be centred at RAF Cosford or in smaller ad-hoc buildings).</p>	1-8. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A017	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13	Yes	Yes	<p>1. Wholeheartedly support the draft Shropshire Local Plan. It is vital to maintain the character and spirit of Albrighton, ensuring it remains a welcoming and supportive place for all residents, protecting green spaces, managing growth responsibly, and preserve the unique charm that makes our village special. Supporting the draft Shropshire Local Plan is essential for safeguarding the environment, community, and way of life that we all hold dear.</p>	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A018	B001	General comment	General comment	Not Specified	Not Specified	<p>1. Tree canopy cover in Shropshire is 13.2%, much lower than the 38% average across the EU. Trees also have a key role in resolving both the ecological and climate crises. Therefore, consider woodland creation and conservation should be a major priority for the LP. Woodland planting should focus on native trees sourced from the UK.</p> <p>2. Encouraged by references to trees' biodiversity contribution in the draft Shropshire Local Plan, but would like it to go further, assigning definite Biodiversity Net Gain (BNG) targets; grasping future opportunities afforded by Local Nature Recovery Strategies (LNRS); and making a robust commitment to protection for individual ancient and veteran trees.</p> <p>3. The draft Shropshire Local Plan should protect valued habitats must be at the heart of the LP. In particular, irreplaceable habitats, including ancient and veteran trees, must be protected from loss and damage.</p> <p>4. Go beyond minimum standards for BNG, both with regard to percentage gain (minimum 20%) and maintenance period (minimum 50 years).</p> <p>5. The draft Shropshire Local Plan should give strong weight to LNRS for development site allocation at a local level - both with regard to identifying site allocations and informing priority locations for the provision of green infrastructure, and habitat creation and enhancement through BNG.</p> <p>6. The draft Shropshire Local Plan should set standards for high-quality green infrastructure for development, including visibility of trees from homes and access to natural green spaces/woodland.</p>	<p>1-6. Noted. No specific changes are proposed to the proposed policy framework for the conservation, enhancement, restoration and provision on new natural assets as a result of the additional material that was the subject of this consultation.</p> <p>1-6. The draft Shropshire Local Plan includes a series of draft policies (including draft Policies DP12-DP17) which establish the policy framework for the conservation, enhancement, restoration and provision on new natural assets.</p> <p>2 and 3. Draft Policy DP12 of the draft Shropshire Local Plan establishes the overarching approach to the conservation of natural assets including irreplaceable habitats, ancient and veteran trees and woodland.</p> <p>2 and 4. Draft Policy DP12 of the draft Shropshire Local Plan includes an expectation that all development delivers at least 10% Biodiversity Net Gain (BNG).</p> <p>2 and 5. Draft Policy DP12 of the draft Shropshire Local Plan includes specific reference to future Local Nature Recovery Strategies. The site assessment process undertaken to inform the selection of proposed site allocations is considered proportionate and robust. This process has been informed by comments from the Council's Ecology Officers.</p> <p>6. Draft Policies DP14-DP16 of the draft Shropshire Local Plan specifically address green infrastructure, open space and landscaping of new development.</p>	No
A019	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraph 6.6 of the updated Green Belt Topic Paper	Yes	Yes	<p>1. Value the Green Belt at Albrighton. Understand the occasional need to reclassify land as the country needs new homes, but believe that the Green Belt at Albrighton should be the last one to be compromised.</p> <p>2. Not many large but quintessential English villages left – and Albrighton is prominent amongst them. Loss of Green Belt and large residential development would undermine this character.</p>	<p>1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A020	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3 and Table 12.4 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. At Albrighton the draft Shropshire Local Plan protects the precious Green Belt, allowing growth of the community through sustainable development with associated infrastructure provision, without permitting sprawl. Albrighton is a rural area and agriculture in the Green Belt is an important activity/protects biodiversity.</p> <p>2. Once adopted, over-development of Albrighton which is detrimental to the area and would lead to traffic problems, must be resisted.</p> <p>3. Land is available at Tasley and the Former Ironbridge Power Station (a brownfield site) which is more appropriate to accommodate the needs of the Black Country. The decision on this matter by the Council should be adhered to and there is no need for further development on the Green Belt and loss of agricultural land.</p>	<p>1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A021	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3 and Table 12.4 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65, Table 8.1 and Table 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it provides clear guidelines for current and future housing and ensures needs across Shropshire and in Albrighton are met to 2038 and beyond development in Albrighton, whilst maintaining control over development. Consider it aligns with national policy and demonstrates collaboration to ensure the Plan's success within the West Midlands region. This plan should be 'stuck to'.</p> <p>2. Paragraphs 12.1-12.3 of the additional Sustainability Appraisal (SA) work and 4.14-4.21 of the Green Belt Topic Paper demonstrate Shropshire Council have engaged the public and evaluated potential development sites and are right to decide the best place for the 'Black Country need' houses are in Tasley, Shrewsbury and the Former Ironbridge Power Station site.</p> <p>3. Paragraphs 7.63-7.64 and 8.1-8.3 of the Housing and Employment Topic Paper and Table 12.4 of the additional SA demonstrate positive planning to meet current and future needs of Albrighton, including existing and proposed allocations. Consider proposed allocations should be built over a 10 year period and following this there should be less development in the village up to 2038. With regard to paragraphs 8.7-8.8, Albrighton is surrounded by Green Belt which provides environmental and economic benefits. As such, proposals for other development especially in the Green Belt or for the 'Black Country' should be refused.</p> <p>4. Agree with paragraphs 5.24-5.27 and 6.4-6.8 of the Green Belt Topic Paper, that sites should be safeguarded for beyond 2038, providing a long-term housing strategy.</p> <p>5. Sites P36a and P36b at Albrighton have been assessed within Appendix 3 of the additional SA work and it was correctly concluded they should not be developed. They are and should remain in the Green Belt and as agricultural land; are near listed buildings and a conservation area; distant from Albrighton centre; unsuitable for housing; would cause major infrastructure problems; and there are adequate other development sites.</p> <p>6. Reassuring that the draft Shropshire Local Plan includes a commitment to safeguarding Green Belt at Albrighton, this preserves vital agricultural land, the village's character, surrounding natural landscape, biodiversity, and environmental sustainability, all of which are crucial given the current Climate Emergency. With regard to paragraphs 6.4-6.8 of the Green Belt Topic Paper, it is important that this Green Belt is safeguarded. Housing should be directed to proposed allocations and employment for the town be based at RAF Cosford or in smaller ad-hoc buildings. Development should be phased.</p>	1-6. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A022	B001	General comment	General comment	Not Specified	Not Specified	1. National Highways or the SRN does not feature within the documents subject to this consultation apart from in passing references. Therefore, National Highways has no explicit comments to make on any of the documents provided.	1. Noted.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A023	B001	Updated Housing and Employment Topic Paper	General comment	Not Specified	No	<p>1. Support the Council's continued focus on the high growth option seeking to achieve a 15% uplift on local housing need whilst also still making an allowance for meeting the unmet needs of the Black Country authorities.</p> <p>2. Object to the Council's proposed approach to accommodating the 500 dwelling uplift to the housing requirement. Consider Option 3: increasing site allocations should be the preferred option, as in a plan-led system identification of deliverable site allocations provides greater certainty that the housing requirement will be met. Clearly, the Council considers there is available capacity within existing strategic, principal and key centres for these sites to come forward, so they should be allocated. The Council recognises the benefits of identifying allocations to accommodate specific needs, as they are doing so for the proposed contributions to the Black Country, unclear why the same approach is not take for the increased contribution to local needs.</p> <p>3. Whitchurch is one settlement where housing guidelines and windfall allowances are proposed to increase. Proposed allocation WHT014, has additional land adjoining it (plan submitted) which has been promoted as a potential extension to this allocation in the event more land is needed for housing. This site has capacity for around 30 dwellings, is not subject to any technical, physical or environmental constraints, and is promoted by a national housebuilder. Allocating it would provide greater certainty about the ability to meet the increased housing guideline for the town.</p>	<p>1. Noted.</p> <p>2. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>3. Whilst the Council is proposing a 75 dwelling uplift to the proposed housing guideline for Whitchurch, as documented within Table 8.7 of the Housing & Employment Topic Paper, the outstanding windfall allowance would be just 20 dwellings (due to the level of completions since the start of the proposed plan period and commitments at 31st March 2023). The Council has significant confidence that this windfall allowance is deliverable in the town, without the need for further site allocations.</p>	No
A024	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report	Paragraphs 12, 12.23, 13.46 and 13.54. Tables 12.1-12.4. Appendix 3.	Yes	Yes	<p>1. The Council has undertaken detailed, rigorous and extensive additional assessment work to produce the updated Local Plan material.</p> <p>2. Tables 12.1 and 12.2 demonstrate a comprehensive updated Stage 2a Housing Sustainability Appraisal Site Assessment has been undertaken (included in Appendix 1).</p> <p>3. With regard to Table 12.3, consider the methodology used to undertake the assessment is sound and support the conclusion that Tasley, Shrewsbury and the Former Ironbridge Power Station are the most appropriate locations to accommodate the proposed housing contribution to the unmet needs forecast to arise in the Black Country.</p> <p>4. With regard to Table 12.4, agree proposed allocations ALB017 & ALB021 are suitable to meet medium-term housing needs of Albrighton. Also concur Albrighton is not a suitable location to accommodate unmet needs forecast to arise in the Black Country. Agree no additional housing sites should be released from Green Belt in or around Albrighton except those already included in the draft Shropshire Local Plan to be safeguarded for development after 2038.</p> <p>5. Concur with Paragraph 13.46 and 13.54 that Option B Urban Focus would have a positive effect and is the most sustainable of the three options. Albrighton is not suitable for additional development beyond that which is included in the draft Shropshire Local Plan.</p> <p>6. The updated Stage 3 Site Assessment for Albrighton is a further comprehensive assessment of sites P36A and P36B. Support the recommendations that these sites should not be developed, they should both be retained as Green Belt.</p>	<p>1-6. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A024	B002	Updated Housing and Employment Topic Paper	Paragraph 7.63-7.64, 8.73h, 8.84, and 16.64-16.65. Tables 8.1-8.3.	Yes	Yes	<p>1. Paragraph 7.63-7.64: Support the 500 dwelling increase to the housing requirement to 31,300 dwellings to 2038, if this is undertaken in an appropriate and sustainable manner.</p> <p>2. Tables 8.1-8.3 show sufficient supply to achieve the proposed housing guideline of 500 dwelling for Albrighton. However, more housing is planned in Albrighton than shown in Table 8.1 (examples total 509 dwellings). Table 8.3 shows dwellings on proposed allocations ALB017 & ALB021 are forecast to be delivered steadily and sustainably over years 1 to 10 (from 1 April 2023), as this is a high-density scheme (see Table 8.2) it is appropriate that less development occurs in Albrighton between 2033-2038 and it means the settlement is delivering more than its share.</p> <p>3. Paragraphs 8.73h, 8.84 and 16.64: Albrighton is inset in the Green Belt, a relevant constraint to further windfall development opportunities. No development should take place in Green Belt that is not planned in the draft Shropshire Local Plan.</p> <p>4. Paragraph 16.64: Consider Albrighton is not a suitable location to accommodate additional employment development. Safeguarded land should be for residential needs of Albrighton. The small scale windfall opportunities exist are not suitable to accommodate the scale of the proposed employment land contribution to the Black Country.</p> <p>5. Paragraph 16.65: Agree Albrighton is not a suitable location to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A024	B003	Updated Green Belt Topic Paper	Paragraphs 2.1-2.12, 4.7-4.10, 4.14-4.21, 5.3b, 5.16, 5.23-5.27, 6, 6.1, 6.4, 6.5-6.8, 6.13 and 6.19d. Table 5.1	Yes	Yes	<p>1. Agree with paragraph 5.16, where Green Belt boundaries are amended exceptional circumstances must be demonstrated through Local Plans or neighbourhood plans. In Paragraphs 2.1-2.12, consider the Council demonstrates a sound assessment (consistent with the NPPF) of the exceptional circumstances for releasing Green Belt land for both Shropshire and the Black Country needs.</p> <p>2. Paragraph 4.7-4.10 and 4.14: Agree the proposed spatial strategy should continue to be underpinned by the principles of 'high growth' and 'urban focus' with the majority of development directed towards urban areas. This should inform levels of development in settlements.</p> <p>3. Paragraphs 4.15-4.21 and 6.13: Agree with and consider the Council's assessment and identification of sites (at Tasley, Shrewsbury and the former Ironbridge Power Station) to accommodate proposed contributions to the unmet needs forecast to arise in the Black Country is sound. Would prefer no Green Belt release at all, but it would appear reasonable to limit this to east of Shifnal Industrial Estate for 30ha of employment land.</p> <p>4. Paragraphs 5.22-5.27: Role of safeguarded land not widely understood. To ensure a longer-term sustainable supply of land, it should be embargoed to development during the timescales addressed in the draft Shropshire Local Plan. To remove doubt, indicative timescales for phased future development should be provided but sites only developed once allocated in a Local Plan.</p> <p>5. Paragraphs 5.3b, 6.1, 6.4, 6.5a and 6.5b and 6.6-6.8: Concur Albrighton is a large urban village which is sensitive to development. Maintaining Green Belt protections and ensuring phased sustainable development is key. Understand development will occur at ALB017 & ALB021 (specific timescales for development should be identified), together with some with small-scale windfall residential development. Agree it is appropriate to identify three areas of safeguarded land for phased and sustainable future development (but must be beyond 2038, with specific timescales identified). Employment should be directed to RAF Cosford. Green Belt should be protected (informed by engagement with Staffordshire Council to maintain a buffer to Codsall).</p> <p>6. Paragraphs 6.19 and 6.19d: Agree once the draft Shropshire Local Plan is adopted and identified areas safeguarded, Green Belt boundaries around Albrighton need not be changed at the end of the next plan period.</p>	1-6. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A025	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65, Table 8.1 and Table 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it has been informed by engagement with the local community at Albrighton; defines and provides certainty on suitable land for development at Albrighton so that housing need can be met in a controlled and sustainable manner.</p> <p>2. Paragraphs 12.1-12.3 of the additional Sustainability Appraisal (SA) work and 6.13 of the Green Belt Topic Paper indicates following consultation and assessment Shropshire Council considers sites at Tasley, Shrewsbury and the Former Ironbridge Power Station are best suited to accommodate proposed contributions to the Black Country. Albrighton is wholly unsuitable for this purpose.</p> <p>3. Paragraphs 7.63-7.64, 8.1-8.3 and 16.64 of the Housing and Employment Topic Paper and Table 12.4 of the additional SA demonstrate positive planning to meet current and future needs of Albrighton, including existing and proposed allocations. Consider proposed allocations should be built over a 10 year period and following this there should be less development in the village up to 2038. With regard to paragraphs 8.7-8.8, Albrighton is surrounded by Green Belt which provides environmental and economic benefits. As such, proposals for other development especially in the Green Belt or for the 'Black Country' should be refused.</p> <p>4. Through the site assessment it was concluded that sites P36a and P36b at Albrighton should not be developed. They are and should remain in the Green Belt and as agricultural land; are distant from Albrighton centre; would have an adverse effect on facilities at Albrighton; are unsuitable for housing including for the Black Country; would cause major traffic problems; and there are adequate other development sites.</p> <p>5. Agree land should be safeguarded for development after 2038 at Albrighton (this is sufficient to meet needs post 2038) as specified in paragraphs 5.24-5.27 and 6.4-6.8 of the Green Belt Topic Paper.</p> <p>6. Reassuring that the draft Shropshire Local Plan includes a commitment to safeguarding Green Belt at Albrighton, this preserves vital agricultural land, the village's character, surrounding natural landscape, biodiversity, and environmental sustainability, all of which are crucial given the current Climate Emergency. With regard to paragraphs 6.4-6.8 of the Green Belt Topic Paper, it is important that this Green Belt is safeguarded. Housing should be directed to proposed allocations and employment for the town be based at RAF Cosford.</p>	1-6. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A026	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comment	No	No	<p>1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.</p>	1. Noted, see response to A0153.	No
A027	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comment	No	No	<p>1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.</p>	1. Noted, see response to A0153.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A028	B001	Updated Housing and Employment Topic Paper.	Paragraph 2.12	Yes	No	<p>1. The Council's preferred approach to accommodating the 500 dwelling uplift to the proposed housing requirement is through adjustments to settlement guidelines and windfall allowances. This approach is broadly supported, but it is considered that the distribution of this growth summarised in Paragraph 2.12 (Shrewsbury, Whitchurch and the former Ironbridge Power Station) is too narrow. It is considered a proportion of this growth should be directed to Community Hubs (through modest extensions to settlement boundaries) where it would help sustain communities and local services/facilities.</p> <p>2. Agree the 1,500 dwelling uplift to meet the Black Country's needs should be accommodated on specific sites well related and connected to the Black Country.</p> <p>3. WIC005 at Woore (a sustainable Community Hub) is a sustainable site and well placed to accommodate some modest additional growth commensurate with the scale and function of the settlement. Details of the settlement (range of services and facilities available) and characteristics of the site (well related to the settlement, adjoining the development boundary and contained by built form; accessible to services and would support their long-term sustainability; frontage onto London Road; no Green Belt, flood risk, or heritage constraints; consider it can be developed whilst maintaining a gap between Woore and Irelands Cross; and it has a willing landowner - plan of the site provided) which make it suitable for development provided. Development of the site is consistent with the aspirations of the NPPF.</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>2. Noted.</p> <p>3. No specific changes are proposed to the proposed strategy for Woore as a result of the additional material that was the subject of this consultation. Shropshire Council considers proposals for Woore are appropriate and it should be noted that the Woore Neighbourhood Plan was recently adopted and allows for appropriate housing development in the settlement.</p>	No
A029	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 6.4-6.8 and 8.7-8.8 of the Green Belt Topic Paper. Paragraphs 7.63-7.64 of the Updated Housing and Employment Topic Paper. Paragraphs 12.1-12.4 of the Updated Additional Sustainability Appraisal.	Yes	Yes	<p>1. Feel Albrighton is balanced with green spaces and gradual growth. Supporting the draft Shropshire Local Plan is essential for preserving agricultural integrity, and ensure Green Belt remains protected for future generations</p> <p>2. Paragraph 12.1-12.4 of the additional Sustainability Appraisal (SA) work and paragraphs 4.14-4.21 of the Green Belt Topic Paper: Agricultural land is important for future sustainable food production and local employment / businesses. Believe agricultural land should be protected from development, Green Belt is one way to achieve this. Note that within the draft Shropshire Local Plan you have a plan to accommodate growth and support the proposed allocations, which has been informed by careful consideration. However, concerned by site promotions for large scale development in the Green Belt at Albrighton from parties which feel the draft Shropshire Local Plan is incorrect.</p> <p>3. Paragraphs 6.4-6.8 of the Green Belt Topic Paper: The Conservation Area borders the Green Belt, if these are of Green Belt is developed it would undermine its character and charm.</p> <p>4. Paragraphs 8.7-8.8 of the Green Belt Topic Paper: The ability to walk through green spaces is important for health and wellbeing.</p> <p>5. Paragraphs 7.63-7.64 of the Housing & Employment Topic Paper: Do not object in principle to housing growth and happy Shropshire Council has decided to allocate a further 500 houses by 2038. Contributing in a considered and sustainable way to the housing growth required by our Country as a whole.</p>	<p>1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A030	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paras 12.1-12.3, Table 12.4 and Appendix 3 of the Sustainability Appraisal. Paras 7.63-7.64, 8.7-8.8, 16.64-16.65, Table 8.1 and Table 8.3 of the Housing and Employment Topic Paper. Paras 4.14-4.21, 5.23-5.27, 6.4-6.8 of the Green Belt Topic Paper.	Yes	Yes	<p>1. Support of the draft Shropshire Local Plan as it provides much-needed protection to the Green Belt at Albrighton, which forms part of its character and brings people to the village. Support proportionate developments and consider the draft Shropshire Local Plan provides for controlled expansion of the village. Confident the plan is consistent with national policy and believe my needs have been heard and met.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A031	B001	Updated Housing and Employment Topic Paper.	Paragraphs 2.9(a-c), 2.10, 2.14 and 2.37	No	No	<p>1. Consider proposed uplifts to the housing requirement summarised in paragraphs 2.9(a-c) are too high and affect only those parts of the County in geographic proximity of the Black Country, causing imbalance across Shropshire.</p> <p>2. Consider the proposed approach to accommodate the uplift to the housing requirement summarised in paragraph 2.10 is not compliant without consultation and agreement of communities with Neighbourhood Plans.</p> <p>3. Consider uplifts of 600 dwellings at Tasley Garden Village and the Former Ironbridge Power Station adversely affect the rural nature of Much Wenlock.</p> <p>4. Key Centres should be removed from spatial strategies, they are mostly rural settlements which require protection/improved infrastructure.</p> <p>5. The document indicates over development in the Much Wenlock Place Plan Area, due to housing proposals at Much Wenlock, the Former Ironbridge Power Station and Cressage. This housing is not balanced with employment, so is unsustainable.</p> <p>6. Due to physical (small settlement, in the highest category Flood Rapid Response Catchment, significant flood risk, and the A458/A4169 strategic corridor running through the centre), infrastructure (particularly roads), environmental (large conservation area, archaeological interest, many listed buildings and proximity to the AONB which is not recognised), and other constraints, Much Wenlock is a sensitive settlement where development needs to be carefully planned and is entirely unsuitable to accommodate any of the proposed contribution to the Black Country.</p> <p>7. The Council has not made it clear Much Wenlock was a location to accommodate proposed contributions to the Black Country and form a commuter settlement. This is inconsistent with the established position of limited development to meet local needs; and is unsustainable/will be detrimental to achievement of net zero, given lack of public transport links; increased reliance on car journeys; and a lack of wider infrastructure.</p> <p>8. Consider there is no need to make contributions to the Black Country given the easing of top-down targets (particularly at Wolverhampton).</p> <p>9. Confusion as to whether Buildwas is part of a Community Cluster of Strategic Settlement.</p> <p>10. Paragraph 16.127 incorrectly references Highley, which is not in the Much Wenlock Place Plan Area.</p> <p>11. Consider it is not possible to manage flood risk on proposed allocation MUW012VAR.</p> <p>12. Consider this and past consultation is not appropriate. In the current consultation questions asked use planning jargon. As such it does not comply with the duty to act fairly.</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p> <p>2 and 3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>3. For the avoidance of doubt, whilst specific contributions to the Black Country on the proposed allocations at Tasley Garden Village and the Former Ironbridge Power Station, this has not resulted in an increase to their overall capacity. This relates to existing dwellings proposed on the site, recognising they are well-placed to accommodate part of the proposed housing contribution to the Black Country.</p> <p>4-7. No specific changes are proposed to the proposed strategy for Much Wenlock as a result of the additional material that was the subject of this consultation.</p> <p>4-6. Shropshire Council considers that it is appropriate for Key Centres to form part of the 'urban' tier of settlement. However, it is recognised that the Key Centres across Shropshire are diverse. As such the specific development strategy proposed for each settlement has been informed by consideration of the settlements characteristics, constraints, and opportunities. Shropshire Council considers that the proposed development strategies for each Key Centre is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy).</p> <p>6 and 7. The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Whilst the Council considers Much Wenlock forms part of the geography within which appropriate sites to accommodate the proposed contribution to the Black Country, it is not proposed that any of these contributions will be accommodated within this settlement.</p> <p>8. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
							<p>30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>9. The Former Ironbridge Power Station has been identified as a proposed new Strategic Settlement, the existing settlement of Buildwas has been identified as a proposed Community Cluster.</p> <p>10. Noted, this is a typographical error, the reference to Highley should state Much Wenlock.</p> <p>11. The site assessment process undertaken to inform the selection of proposed site allocations (including MUW012VAR) is considered proportionate and robust. This process has been informed by specific consideration of flood risk and was directly informed by a Stage 1 and Stage 2 Strategic Flood Risk Assessment. Draft site guidelines for proposed allocation MUW012VAR include very clear expectations for the site to manage flood risk. The Council considers this site provides an opportunity to achieve community benefit, most notably implications for on and off site flood alleviation at Hunters Gate and Forester Avenue.</p> <p>12. The Council considers the consultation process undertaken to inform the draft Shropshire Local Plan, including this consultation, is appropriate and consistent with its Statement of Community Involvement and national requirements. The ongoing examination seeks to determine whether the draft Shropshire Local Plan is legally compliant and sound, so it is considered logical that the questions seek views on these matters. The questions on the consultation response form are consistent with those on the model Regulation 19 response form prepared by the Planning Inspectorate and an accompanying guidance note was provided to support understanding and responses on these issues.</p>	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A031	B002	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	Paragraphs 4, 6, 10, 15-17, 19 and 27	No	No	<ol style="list-style-type: none"> 1. Consider policies do not go far enough, given the demographics of Shropshire. 2. In paragraph 4, consider all sites of less than 5 dwellings must include at least one M4(2) dwelling. 3. In paragraph 6, 'strongly encouraged' should be replaced with 'must'. 4. In paragraph 10, remove the word 'ideally'. Dwellings for older people or those with special needs must be accessible to the town centre. 5. In paragraph 15, reduce the 250 dwelling threshold to 200 dwellings to avoid schemes of 249 dwellings. Standards should be 20% M4(2) and 70% M4(2). 6. In paragraph 16 standards should be 20% M4(2) and 70% M4(2). 7. Consider that flexibility to exceed the relevant settlement guidelines should be removed. 8. Proposed allocation MUW012VAR lies at the furthest edge of Much Wenlock distant from services and facilities and routes between are steep. This limits the ability of older people and those with disabilities to access them. There are options in Much Wenlock more suitable for older people and those with disability's - more accessible and protected from flood risk by attenuation ponds. Proposed allocations should be reassessed based on the proposed policies in the draft Shropshire Local Plan. 9. Consider the aspirations in paragraphs 1, 8, and 10 have not nor is it proposed they will be observed when implemented in Much Wenlock. This demonstrates the policy is not legally compliant or sound. 10. Consider this consultation is not appropriate. In the current consultation questions asked use planning jargon. As such it does not comply with the duty to act fairly. 	<p>1-7 and 9. Shropshire Council is committed to providing a mix of sizes, types and tenures of housing to meet the needs of different groups in our communities, including older people and those with disabilities and special needs. The intention is that this policy would form part of the draft Shropshire Local Plan. Planning law requires that applications for planning permission be determined in accordance with the adopted Development Plan, unless material considerations indicate otherwise.</p> <p>2 and 3. Shropshire Council considers that the draft policy strikes an appropriate balance on accessibility and accessibility standards and dementia/disability friendly design standards. Notably, Government is currently considering whether to raise the minimum accessibility and adaptability standard to equivalent to M4(2).</p> <p>4. The Council considers that it is important to allow an element of flexibility regarding the location of specialist housing, in order to positively respond to the needs of our communities. However, the policy explanation is clear that where services and facilities are not already available, or there is a need for specific services and facilities on the specialist housing site, this provision should be responsive to the types of services and facilities already available and be proportionate in scale to the type of specialist housing.</p> <p>5 and 6. The Council considers the proposed thresholds are appropriate. The thresholds identified for the 'categories' of housing within which proportionate provision of appropriate forms of specialist housing is required are responsive to both our understanding of the nature of development schemes that occur in Shropshire and the concept of achieving multi-generational and inclusive communities.</p> <p>7. It is considered that this approach is consistent with draft Policy SP7 and supports the delivery of specialist housing to meet the needs of older people and those with disabilities and special needs.</p> <p>8 and 9. The site assessment process undertaken to inform the selection of proposed site allocations (including MUW012VAR) is considered proportionate and robust. This process has been informed by specific consideration of flood risk and was directly informed by a Stage 1 and Stage 2 Strategic Flood Risk Assessment. Draft site guidelines for proposed allocation MUW012VAR include very clear expectations for the site to manage flood risk. The Council considers this site provides an opportunity to achieve community benefit, most notably implications for on and off site flood alleviation at Hunters Gate and Forester Avenue.</p> <p>10. The Council considers this consultation is appropriate and consistent with its Statement of Community Involvement and national requirements. The ongoing examination seeks to determine whether the draft Shropshire Local Plan is legally compliant and sound, so it is considered logical that the questions seek views on these matters. The questions on the consultation response form are consistent with those on the model Regulation 19 response form prepared by the Planning Inspectorate and an accompanying guidance note was provided to support understanding and responses on these issues.</p>	No
A031	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 2.6-2.8 and 6.8	No	No	<ol style="list-style-type: none"> 1. Consider providing housing for the Black Country is an unsustainable premise and no contribution should be made (option 1 of the reasonable options for any contribution). 2. Two of the proposed sites to accommodate the proposed contribution to the unmet housing needs forecast to arise in the Black Country (Former Ironbridge Power Station and Tasley Garden Village) 'sandwich' Much Wenlock, a small rural town with inadequate infrastructure and no plans for this to be enhanced, so it will be overwhelmed by this development (particularly through traffic). 3. For chapters 6-10 of the additional Sustainability Appraisal (SA) work, see 	<p>1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						<p>comments on the housing and employment topic paper.</p> <p>4. The current/emerging Neighbourhood Plan indicates community opinion. This indicates no support for large-scale development in the town and a need to focus on self-sufficiency/sustainability. Large scale development on the edge of town also does not respond to the towns demographics - older/ageing population.</p> <p>5. Paragraph 11.36 of the additional SA work states the obvious.</p> <p>6. Consider Appendix 9 of the additional SA demonstrates the Council ignores representations from the community, where they do not fit with pre-ordained decisions.</p> <p>7. The main driver for a large site allocation in Much Wenlock was meeting national housing targets, which are no longer mandatory.</p> <p>8. No mitigation is proposed to offset the detrimental impact (particularly with regard to SA objectives 6 private care use and 10 flood risk) of accommodating 1,500 dwellings towards the unmet housing needs forecast to arise in the Black Country. This will make matters worse, and whilst this may be considered marginal across Shropshire, in sensitive locations like Much Wenlock such marginal differences can have great impact.</p> <p>9. References to Much Wenlock/Much Wenlock Place Plan are inconsistent through the document. This implies inadequate consideration of impact on local services, fails to consistently recognise that Much Wenlock is a rapid response catchment for flood risk (highest category), and fails to recognise lack of rail connectives and infrequent bus provision.</p> <p>10. With regard to Appendix 7 and the assessment of MUW012VAR: -It reiterates the site scores fair at stage 2b of the site assessment, whilst alternatives score good. -Consider the flood risk assessment is incorrect and reference to potential for flood alleviation unsubstantiated. -It is identified as potentially being large enough to accommodate a contributions to the Black Country, but the town is identified as unsuitable due to size, this is inconsistent. -Reference is made to a relationship between Much Wenlock and the Black Country, but this is not explained. -Reference is made to the A458 corridor, but there is no such thing and it does not link to the Black Country. -Reference is made to the need for traffic calming on the A458, but no recognition this is due to new development.</p> <p>11. Consider this consultation is not appropriate. In the current consultation questions asked use planning jargon. As such it does not comply with the duty to act fairly.</p>	<p>considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>2. Shropshire Council considers that a robust and proportionate approach has been undertaken to identify the geography within which reasonable site options to accommodate the proposed contribution to the Black Country could be located. It is notable that within ID37 the Inspectors indicated that they were content with the approach to identifying a reasonable assessment geography. Furthermore, Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>3. Noted. See response to A031 - B001.</p> <p>4. As explained within paragraph 2.30 of the draft Shropshire Local Plan "The Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the cases of Much Wenlock and Shifnal, both their Neighbourhood Plans cover the period to 2026, in line with the SAMDev Plan, and therefore there is a need for the Council to plan effectively for a further 12 years to the end of the new plan period to 2038. In these cases, the Shropshire Local Plan provides a development strategy for these areas." It is important to note that Neighbourhood Plans must be in conformity with the adopted Development Plan.</p> <p>5. Noted.</p> <p>6 and 11. The Council considers this consultation is appropriate and consistent with its Statement of Community Involvement and national requirements. The ongoing examination seeks to determine whether the draft Shropshire Local Plan is legally compliant and sound, so it is considered logical that the questions seek views on these matters. The questions on the consultation response form are consistent with those on the model Regulation 19 response form prepared by the Planning Inspectorate and an accompanying guidance note was provided to support understanding and responses on these issues.</p> <p>7-10. Shropshire Council considers that the proposed development strategy for Much Wenlock is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy).</p> <p>7-10. The site assessment process undertaken to inform the selection of proposed site allocations (including MUW012VAR) is considered proportionate and robust. This process has been informed by specific consideration of flood risk and was directly informed by a Stage 1 and Stage 2 Strategic Flood Risk Assessment. Draft site guidelines for proposed allocation MUW012VAR include very clear expectations for the site to manage flood risk. The Council considers this site provides an opportunity to achieve community benefit, most notably implications for on and off site flood alleviation at Hunters Gate and Forester Avenue.</p>	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A032	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65, Table 8.1 and Table 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Consider the draft Shropshire Local Plan is a balances assessment and future plan which takes into account not only housing and amenities, but also appreciate the need to protect the Green Belt.</p> <p>2. Paragraph 12.1-12.3 of the additional Sustainability Appraisal (SA) work and 6.13 of the Green Belt Topic Paper: Consider the Council has appropriately assessed and consulted upon local need and Black Country needs. There conclusion Albrighton is not an appropriate location to accommodate proposed contributions to the Black Country is supported and agree with the sites identified for this purpose - at Tasley, Shrewsbury and the Former Ironbridge Power Station.</p> <p>3. Table 12.4 of the additional SA work and paragraphs 4.14-4.21 and 6.4-6.8 of the Green Belt Topic Paper: Development should be in accordance with the draft Shropshire Local Plan. Two allocations are proposed at Albrighton, so no further sites needs to be considered (particularly in the Green Belt). New employment should be directed to RAF Cosford or constitute smaller ad-hoc development. Agree with the 3 proposed areas of safeguarded land, which should be retained until post 2038. Land outside of the plan should not be developed.</p> <p>4. Appendix 3 of the additional SA work demonstrates sites P36A and P36B have been assessed and it was concluded they should not be allocated. Do not need housing in this location which would cause traffic issues.</p> <p>5. Paragraphs 7.63-7.64 of the Housing & Employment Topic Paper conclude the need to increase the housing requirement by 500 dwellings. Consider this is reasonable, but more would be unsustainable.</p> <p>6. Table 8.1 of the Housing & Employment Topic Paper demonstrates over 500 dwellings are planned for Albrighton including existing and proposed allocations. Proposed allocations should be developed steadily over the next 10 years as indicated in Table 8.3. There should then be less development in the village to 2038.</p> <p>7. Paragraphs 8.7-8.8 and 16.64 of the Green Belt Topic Paper: Green Belt surrounds Albrighton and should be retained as it supports the retention of the village's character, constitutes 'real' farmland and green space that has a direct effect on mental health.</p>	1-7. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A033	B001	Updated Green Belt Topic Paper.	General comment	Not Specified	Not Specified	<p>1. Deficiencies in housing supply at Alveley for specific groups is not controversial and I have no issue with the conclusions. However, unclear about what the 2017 Local Housing Survey and Place Plan documents are. An ad-hoc survey by a site promoter cannot have evidential legitimacy.</p> <p>2. Recent proposals in a community survey by relevant community groups in Alveley are to demolish the existing social club and village hall and construct a new multi-purpose sports and leisure facility on the cleared site, funded by sale of ALV006/ALV007 for housing. This is inconsistent with proposals for mixed development comprising sports and recreation facilities and 35 dwellings on ALV006/ALV007 and the justification for release of the land from the Green Belt. Proposals would not support more than 35 dwellings, however if only part of ALV006/ALV007 is developed, pressure to release the remainder for housing development may be irresistible in future years- particularly if the financial pressures to maintain new facilities prove unmanageable - largest contributor in the past was the cricket club, but they now have their own facility.</p> <p>3. Unaware of any village survey which identified potential to improve leisure facilities and activities as proposed through ALV006/ALV007. Consider there is no indication of local need for any specific sporting or recreational activities not already catered for (relevant community groups are now undertaking a survey seeking ideas). In comparison to similar settlements, Alveley is well served by leisure facilities. No doubt improvements could be made, but these are challenging to promote, manage and maintain.</p> <p>4. Not desire to see ALV006/ALV007 developed, but crucial if this occurs that it achieves a high-quality design. Particularly encouraged by reference to retention of mature trees and hedgerows which are of ecological value; and identification of the site as a village gateway requiring a high-quality layout. Development must also respond to the character of the village.</p>	<p>1-4. No specific changes are proposed to the proposed strategy for Alveley as a result of the additional material that was the subject of this consultation.</p> <p>1. Place plans are documents which focus on local infrastructure needs in communities across the county. They are informed by proactive engagement with local communities via Town and Parish Council's.</p> <p>2-4. ALV006/ALV007 is a proposed allocation within the submission version of the draft Shropshire Local Plan and no change is proposed to this allocation through the additional material subject to this consultation. The new Green Belt Topic Paper provides further information on the consideration of alternative options and determination of whether exceptional circumstances exist to justify the proposed removal of sites from the Green Belt. Shropshire Council considers this allocation have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p> <p>2-4. Any development of proposed allocation ALV006/ALV007 would be expected to comply with relevant site guidelines. These includes an expectation that the scheme would provide for a replacement club building and community sports and recreation facilities (and associated infrastructure); achieve a high-quality layout recognising the site is a gateway and will form the edge to the Green Belt; and seeking to retain mature and significant trees and hedgerows.</p>	No
A034	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 8.7-8.8 and 16.64 of the updated Housing and Employment Topic Paper. Paragraphs 5.24-5.27 and 6.4-6.8 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan which clearly identifies allocations to meet current housing needs and future housing need through safeguarded land at Albrighton and reassuringly seeks to provide robust protection of the Green Belt (which is used for farming, ensures biodiversity, environmental sustainability and the character of the village) in Albrighton.</p> <p>2. If sites P36A and P36B were development, the infrastructure will not cope with the increased volume of traffic and it would adversely effect the environment through increased pollution. A supermarket would have a detrimental affect on the village centre and its traders.</p> <p>3. Feel there are many brownfield sites which should be explored for providing housing before greenfield sites.</p>	<p>1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p> <p>3. Shropshire Council considers that proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is greenfield or brownfield.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A035	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 16.64-16.65, Table 8.1 and Table 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 6.4-6.8 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Fully support the draft Shropshire Local Plan which is well-considered, collaborative and positive. It clearly defines the areas allocated for development in Albrighton ensuring needs are met, whilst also providing considerable protection of the Green Belt at Albrighton which is critical for residents health and wellbeing, is important agricultural land and forms a biodiversity/sustainability role.</p> <p>2. Paragraphs 12.1-12.3 of the additional Sustainability Appraisal (SA) work demonstrate the Council has identified sites at Tasley, Shrewsbury and Ironbridge Power Station to accommodate proposed contributions to the unmet housing needs of the Black Country, so no need to look elsewhere.</p> <p>3. With regard to Table 12.4 of the additional SA work and paragraphs 6.4-6.8 of the Green Belt Topic Paper, the safeguarded land identified is required for development after 2038 to ensure long term housing needs can be met. any development should be phased to protect the community feel. Furthermore Green Belt around Albrighton has to be protected especially from the Boningale Homes proposed Albrighton South sites P36A and P36B.</p> <p>4. Appendix 3 of the additional SA work demonstrates sites P36A and P36B have been assessed and are unsuitable for housing as it would result in loss of agricultural land, impact on nature, and would cause enormous traffic problems (exacerbating existing issues and risking the ability for emergency service access - a real issue given ageing demographics). With regard to Paragraph 16.64 of the Housing and Employment Topic Paper, there is no need for new employment development or a secondary school in the Green Belt and the medical centre proposal is poorly thought out. Existing provision is sufficient and the Green Belt needs to be protected.</p> <p>5. Paragraphs 7.63-7.64 and Table 8.1 of the Housing and Employment Topic Paper indicate a proposed target of 500 dwelling in Albrighton to 2038, this is reasonable. However sites in the Green Belt not outlined for development must be resisted. As summarised in Table 8.3 the community and natural environment deserves a break in disruption, noise pollution, HGV traffic and drainage issues and so development should be limited in the period up to 2038.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A036	B001	Updated Green Belt Topic Paper.	Paragraph 7.19	No	No	<p>1. Exceptional circumstances to meet local needs have not been demonstrated for proposed allocations at Alveley.</p> <p>2. Since submission of the draft Shropshire Local Plan there is existing empty housing stock available on the market and recent developments have occurred including 25 mixed sized homes on the former garage site, 6 terraced houses on the social club car park, and a park home site with unfilled plots and more capacity. As such, consider there is no need at Alveley and EV051 is no longer accurate.</p> <p>3. Proposed allocation ALV006/ALV007 is a mixed-use development which could improve community provision for sports and recreation and housing. Would support release of this plot from the Green Belt as it is within the boundary of the village and already has access on to the busy A442.</p> <p>3. Proposed allocation ALV009 should be safeguarded land along with ALV002 as unmet housing need was not proven and the plans for these sites would not improve community facilities. There is also limited access on to the busy A442.</p>	1-3. Noted. No specific changes are proposed to the proposed strategy for Alveley as a result of the additional material that was the subject of this consultation.	No

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A037	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65, Table 8.1 and Table 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Fully support the draft Shropshire Local Plan as it has been carefully considered and informed by community engagement. It will meet housing needs to 2038 and beyond and includes a 1,500 dwelling contribution to the unmet housing needs forecast to arise in the Black Country. Particularly support the protection of the Green Belt and character of Albrighton, which supports the character of the community and provides farming land.</p> <p>2. Encouraging to see sites more suitable than those at Albrighton identified to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country.</p> <p>3. Relieved sites P36A and P36B have been assessed within Appendix 3 of the additional Sustainability Appraisal (SA) and it was concluded the sites are not appropriate for development and fully agree with this conclusion. Development of these sites would overwhelm infrastructure/amenities; cause traffic chaos; result in loss of Green Belt; loss of agricultural land; and increase CO2 emissions.</p>	1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A038	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65, Table 8.1 and Table 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support many areas of the draft Shropshire Local Plan and consider it is consistent with national policy. It is a well-considered and positive document which considers the needs of local residents and gave them a chance to engage with its development. Consider the draft Shropshire Local Plan gives robust but reasonable protection to the Green Belt around Albrighton, while supporting sustainable housing developments and employment opportunities by highlighting specified areas across Shropshire, including in Albrighton.</p> <p>2. Vital to protect the Green Belt at Albrighton as it prevents urban sprawl, is important agricultural land for food production/security, is a desirable natural landscape, adds character to the village, provides habitats/biodiversity, and is an accessible green space important for mental health.</p> <p>3. The draft Shropshire Local Plan will ensure housing needs are met in Albrighton and Shropshire until 2038 and beyond, whilst maintaining control of the locations and consideration of densities. It clearly defines development sites to meet current and future needs of Albrighton, and these development opportunities were informed by careful consideration, including prioritisation of non-Green Belt sites. Limitations are also set-out explaining where sites should not be developed.</p> <p>4. Encouraging to see joint engagement across nearby counties to ensure its success within the wider West Midlands community.</p>	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

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A039	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it is a positive plan, has been informed by community engagement, has been informed by engagement with the wider West Midlands, and is consistent with national policy. It provides protection for the Green Belt areas of Albrighton (which is essential for the character of the community, important agricultural land, and supports biodiversity); it provides control of housing development - clearly identifying site allocations; it supports economic growth; and it considers community amenities and infrastructure needs. Housing should be developed in accordance with the draft Shropshire Local Plan and sites contrary to it should be refused.</p> <p>2. With regard to paragraphs 4.14-4.21 and 6.13, consider Albrighton is not a suitable location to meet any Black Country housing needs and any proposals for this should be rejected. Proposed contributions should be accommodated on the identified sites at Tasley, Shrewsbury and the Former Ironbridge Power Station, which are more suitable.</p> <p>3. With regard to paragraphs 5.24-5.27 and 6.4-6.8, agree the three sites identified should be safeguarded for development after 2038, but permission should not be allowed before then and their developments should be phased.</p> <p>4. Also with regard to paragraphs 6.4-6.8, at Albrighton, new housing should be built on existing and proposed allocations and new employment at RAF Cosford or small ad-hoc developments. Development should be phased so the village is not overwhelmed and other locations should not be removed from the Green Belt/not developed.</p>	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A040	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	Paragraphs 12.95 & 12.97 and Table 12.5 of the additional Sustainability Appraisal. Paragraphs 16.153-16.154 of the Updated Housing and Employment Topic Paper.	No	No	<p>1. Object to proposed allocation SHR166 (referenced at paragraphs 16.153 and 16.154 of the updated Housing and Employment Topic Paper) which if developed for employment, has the potential to substantially harm both designated and undesignated heritage assets. Objections have been raised to this site throughout the Local Plan review process (appendices A and B are the Reg 19 representation and matter 1 hearing statement). Consider this objection could be addressed through removal of SHR166.</p> <p>2. Since the hearing sessions, the temporary Roman marching camp on SHR166 has been designated as a Scheduled Monument (appendix C is the notification). -Paragraph 205 of the National Planning Policy Framework (NPPF) advises great weight should be applied to conservation of heritage assets and paragraph 206 specifies substantial harm or loss of assets of the highest significance (including Scheduled Monuments), should be wholly exceptional. -Separate to the planning process is the Scheduled Monument Consent (SMC) process, which is necessary for all works to Scheduled Monuments. Consistent with the determinative SMC Policy Statement and Historic England guidance, only Nationally Significant Infrastructure Projects can obtain such consent. -This means development proposed for allocation SHR166 is highly unlikely to comply with requirements and is therefore unachievable.</p> <p>3. There are other constraints to SHR166 which support an objection to its allocation, raised in the Historic England Regulation 19 Consultation Response - these objections still remain.</p> <p>4. Due to inclusion of proposed allocation SHR166, the spatial strategy in the draft Shropshire Local Plan is not achievable and unsound - not consistent with national policy, not justified and not effective.</p> <p>5. Paragraph 21.6a of the Housing and Employment Topic Paper identifies a proposed employment land requirement of 320ha (including 30ha contribution to the Black Country). Previous Employment Topic Paper identified a residual employment land requirement of 270 hectares (para. 17.6), meaning an over-supply of employment land.</p> <p>6. Table 12.2 of the additional Sustainability Appraisal (SA) concludes SHR166 is poor in the context of the settlement and fair in the context of strategic sites - alternative sites perform better.</p> <p>7. Tables 12.5 and 12.6 and paragraph 12.95 of the additional SA considers likely significant effects and mitigation for proposed employment allocations. It recognises SHR166 is one of only two sites that performs poorly where mitigation measures are required. However no explanation or mitigation measures relate to the likely significant effects on the historic environment and the assessments In Appendix 1 and 2 fail to recognise presence of the Scheduled Monument on the site. Therefore impacts, likely significant effects and mitigation measures have not been sufficiently assessed/addressed and a full assessment of reasonable alternatives has not been carried out. Consider in relation to proposed allocation SHR166, the requirements for SEA have not been met</p>	<p>1. Shropshire Council recognises that much of site SHR166 contains a newly designated Scheduled Monument (designated in late 2022). This matter is currently being given due consideration, informed by ongoing engagement with the site promoter. The Council expects for this issue to be considered through the 'stage 2' hearing sessions.</p>	?

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A041	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report	Paragraphs 12, 12.23, 13.46 and 13.54. Tables 12.1-12.4. Appendix 3.	Yes	Yes	<p>1. The Council has undertaken detailed, rigorous and extensive additional assessment work to produce the updated Local Plan material.</p> <p>2. Tables 12.1 and 12.2 demonstrate a comprehensive updated Stage 2a Housing Sustainability Appraisal Site Assessment has been undertaken (included in Appendix 1).</p> <p>3. With regard to Table 12.3, consider the methodology used to undertake the assessment is sound and support the conclusion that Tasley, Shrewsbury and the Former Ironbridge Power Station are the most appropriate locations to accommodate the proposed housing contribution to the unmet needs forecast to arise in the Black Country.</p> <p>4. With regard to Table 12.4, agree proposed allocations ALB017 & ALB021 are suitable to meet medium-term housing needs of Albrighton. Also concur Albrighton is not a suitable location to accommodate unmet needs forecast to arise in the Black Country. Agree no additional housing sites should be released from Green Belt in or around Albrighton except those already included in the draft Shropshire Local Plan to be safeguarded for development after 2038.</p> <p>5. Concur with Paragraph 13.46 and 13.54 that Option B Urban Focus would have a positive effect and is the most sustainable of the three options. Albrighton is not suitable for additional development beyond that which is included in the draft Shropshire Local Plan.</p> <p>6. The updated Stage 3 Site Assessment for Albrighton is a further comprehensive assessment of sites P36A and P36B. Support the recommendations that these sites should not be developed, they should both be retained as Green Belt.</p>	1-6. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A041	B002	Updated Housing and Employment Topic Paper	Paragraph 7.63-7.64, 8.73h, 8.84, and 16.64-16.65. Tables 8.1-8.3.	Yes	Yes	<p>1. Paragraph 7.63-7.64: Support the 500 dwelling increase to the housing requirement to 31,300 dwellings to 2038, if this is undertaken in an appropriate and sustainable manner.</p> <p>2. Tables 8.1-8.3 show sufficient supply to achieve the proposed housing guideline of 500 dwelling for Albrighton. However, more housing is planned in Albrighton than shown in Table 8.1 (examples total 509 dwellings). Table 8.3 shows dwellings on proposed allocations ALB017 & ALB021 are forecast to be delivered steadily and sustainably over years 1 to 10 (from 1 April 2023), as this is a high-density scheme (see Table 8.2) it is appropriate that less development occurs in Albrighton between 2033-2038 and it means the settlement is delivering more than its share.</p> <p>3. Paragraphs 8.73h, 8.84 and 16.64: Albrighton is inset in the Green Belt, a relevant constraint to further windfall development opportunities. No development should take place in Green Belt that is not planned in the draft Shropshire Local Plan.</p> <p>4. Paragraph 16.64: Consider Albrighton is not a suitable location to accommodate additional employment development. Safeguarded land should be for residential needs of Albrighton. The small scale windfall opportunities exist are not suitable to accommodate the scale of the proposed employment land contribution to the Black Country.</p> <p>5. Paragraph 16.65: Agree Albrighton is not a suitable location to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A041	B003	Updated Green Belt Topic Paper	Paragraphs 2.1-2.12, 4.7-4.10, 4.14-4.21, 5.3b, 5.16, 5.23-5.27, 6, 6.1, 6.4, 6.5-6.8, 6.13 and 6.19d. Table 5.1	Yes	Yes	<p>1. Agree with paragraph 5.16, where Green Belt boundaries are amended exceptional circumstances must be demonstrated through Local Plans or neighbourhood plans. In Paragraphs 2.1-2.12, consider the Council demonstrates a sound assessment (consistent with the NPPF) of the exceptional circumstances for releasing Green Belt land for both Shropshire and the Black Country needs.</p> <p>2. Paragraph 4.7-4.10 and 4.14: Agree the proposed spatial strategy should continue to be underpinned by the principles of 'high growth' and 'urban focus' with the majority of development directed towards urban areas. This should inform levels of development in settlements.</p> <p>3. Paragraphs 4.15-4.21 and 6.13: Agree with and consider the Council's assessment and identification of sites (at Tasley, Shrewsbury and the former Ironbridge Power Station) to accommodate proposed contributions to the unmet needs forecast to arise in the Black Country is sound. Would prefer no Green Belt release at all, but it would appear reasonable to limit this to east of Shifnal Industrial Estate for 30ha of employment land.</p> <p>4. Paragraphs 5.22-5.27: Role of safeguarded land not widely understood. To ensure a longer-term sustainable supply of land, it should be embargoed to development during the timescales addressed in the draft Shropshire Local Plan. To remove doubt, indicative timescales for phased future development should be provided but sites only developed once allocated in a Local Plan.</p> <p>5. Paragraphs 5.3b, 6.1, 6.4, 6.5a and 6.5b and 6.6-6.8: Concur Albrighton is a large urban village which is sensitive to development. Maintaining Green Belt protections and ensuring phased sustainable development is key. Understand development will occur at ALB017 & ALB021 (specific timescales for development should be identified), together with some with small-scale windfall residential development. Agree it is appropriate to identify three areas of safeguarded land for phased and sustainable future development (but must be beyond 2038, with specific timescales identified). Employment should be directed to RAF Cosford. Green Belt should be protected (informed by engagement with Staffordshire Council to maintain a buffer to Codsall).</p> <p>6. Paragraphs 6.19 and 6.19d: Agree once the draft Shropshire Local Plan is adopted and identified areas safeguarded, Green Belt boundaries around Albrighton need not be changed at the end of the next plan period.</p>	1-6. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A042	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comment	Yes	No	<p>1. This type of consultation is very important. However the vast majority do not have either the resources or expertise to scrutinise this volume of information. In future consultations of this nature, sufficient time should be provided to allow respondents to procure the service of a competent person who can assist in preparing a full and robust response. The cost of this should be met by the Council with have instigated the consultation.</p>	<p>1. The Council acknowledges that the additional SA work subject to this consultation is technical, but this is unavoidable. This SA work seeks to present the assessment processes and conclusions as clearly as possible whilst ensuring compliance with the assessment methodology and relevant legislation. The Council considers the Housing and Employment Topic Paper (also subject to this consultation) summarises key processes and conclusions (including from the SA), clearly and unambiguously. The Council considers this consultation is appropriate and consistent with its Statement of Community Involvement and national requirements.</p>	No
A042	B002	Updated Housing and Employment Topic Paper	Paragraph 2.3 (page 6)	Yes	Yes	<p>1. No reference to bordering authorities. If plans are drawn-up without consideration of other authorities, how can the plans be ensured not to unduly impact particular areas? There are already considerable "crunch" points of traffic on our major roads around Shrewsbury including the M54.</p>	<p>1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, throughout the plan-making process, under the duty to cooperate. Statements of Common Ground with adjoining Local Authorities form part of the evidence base for the draft Shropshire Local Plan.</p>	No
A042	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report	Appendix 1 (Page 31)	Yes	Yes	<p>1. No specific comments.</p>	<p>1. Noted.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A043	B001	Updated Housing and Employment Topic Paper	Sections 1-11	Yes	Yes	<p>1. Support the proposed increase to the minimum housing requirement to 31,300 dwellings (including a 1,500 dwelling contribution to unmet needs forecast to arise in the Black Country and a 15% uplift above Local Housing Need). National guidance is clear the standard method calculates the minimum annual housing need figure and does not establish a housing requirement. Ambitions to support economic growth, deliver affordable housing and support achieving unmet needs from other authorities should be taken into consideration during plan making. Therefore the uplift of 15% shows draft Policy SP2 is positively prepared.</p> <p>2. The Housing and Employment Topic Paper is clear the housing requirement is a minimum. Welcome this wording as it positively allows for housing needs to be met, supports economic growth, and delivers affordable housing. It should be reflected in draft Policy SP2.</p> <p>3. The Council proposes the 500 dwelling increase to the housing requirement will be accommodated through increases to settlement housing guidelines and windfall allowances (Option 1). Whilst this may deliver the additional 500 dwellings, suggest additional housing allocations (Option 3) within the top 3 tiers of the settlement hierarchy would provide the most certainty of deliverability of market and affordable housing and as such should be identified. This is because they:</p> <ul style="list-style-type: none"> -Provide more certainty that the housing requirement will be achieved. -Ensure the spatial strategy balances the housing needs alongside the employment growth for specific settlements (e.g. Market Drayton is accommodating 3.9% of housing growth and 11.6% of employment growth over the proposed plan period). -Ensure that affordable housing is delivered to meet local needs, given windfall site may fall below affordable housing policy thresholds. -Whilst some of the windfall allowances have already been met, others (particularly in Shrewsbury which is the focus for much of this increase) have either not had a planning application submitted, the planning permission has lapsed or there are identified delivery issues. Therefore, certainty of these sites may be in question. 	<p>1. Noted.</p> <p>2. Noted, appropriate main modifications have been proposed to amend draft Policy SP2 to reflect the conclusions within the Housing and Employment Topic Paper.</p> <p>3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A044	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Various	No	No	<p>1. Consider there are inconsistencies in the Council's approach to the additional Sustainability Appraisal (SA), Housing and Employment Topic Paper and Green Belt Topic Paper and questions remain as to whether they fulfil the Inspectors brief in ID37. Appendix to the response identifies concerns with the Council's superseded SA work and other matters.</p> <p>2. Why has the opportunity to align strategies for allocating sites to accommodate housing and employment contributions to the Black Country not been taken and what is the Council's rationale for allocating housing sites in Shrewsbury, Ironbridge and Bridgnorth to meet needs of the Black Country from a sustainability perspective?</p> <p>-ID37 emphasises the importance of testing separately unmet needs of the Black Country (paragraph 5.6) and ensuring employment and housing growth align (paragraph 5.8).</p> <p>-Proposals are to accommodate contributions to the Black Country's housing needs at Shrewsbury, Ironbridge and Bridgnorth; and employment needs at Shifnal (map provided). This is inconsistent and there is a disconnection between the locations of housing sites, employment sites and the Black Country.</p> <p>-Proposed housing allocations (particularly at Shrewsbury and Ironbridge) are not well located for this purpose, primarily due to geographic separation from the Black Country which will lead to unnecessary travel (particularly by cars) which is unsustainable. It also places undue pressure on existing local services and infrastructure.</p> <p>-Shifnal and Cosford are better placed to accommodate housing contributions to the Black Country. Both are closely aligned with the site to accommodate the proposed employment contribution and benefit from geographic proximity (presenting opportunities for sustainable travel) to the Black Country. However, growth proposals in these locations are minimal.</p> <p>3. Has sufficient developable employment land been allocated to meet the Black Country's needs?</p> <p>-Paragraph 2.30 of the Updated Housing and Employment Topic Paper and Table 12.3 of the additional Sustainability Appraisal (SA) work specify SHF018b&018d has an area of 39ha to achieve 16ha/15.6ha net development. Unclear what the net development area refers to and how it equates to the proposed 30ha contribution to the Black Country.</p> <p>-The Black Country need is assessed in their EDNA 2023, which assumes 40% developable area. Consider developable area will not be greater than 75% of the gross site area, and can be as low as 50%, particularly on constrained sites.</p> <p>-Understand SHF018b&018d has a gross site area of 39ha, however unclear what about developable are. This needs to be established as a comparator against derived need – i.e. 30ha of developable area.</p> <p>-If the developable area is less than 30ha, then consideration needs to be given to the allocation of additional land (extension of SHF018b&018d or identification of other site(s) to ensure needs of the Black Country are fully met.</p> <p>4. Why do the options to accommodate housing to meet Shropshire's need not include identification of new sites?</p> <p>-An option entailing allocating additional sites was not considered when determining how to accommodate the proposed 500 dwelling uplift to the housing requirement, but was considered when determining how to accommodate the proposed 20ha uplift to the employment land requirement. This is inconsistent and erroneous.</p> <p>-Consider the option to increase the density of proposed allocations is undeliverable, particularly due to the need to achieve biodiversity net gain on site.</p> <p>5. Why has land not been safeguarded to meet future unmet needs of the Black Country?</p> <p>-Land around Shifnal is released from the Green Belt and safeguarded to meet</p>	<p>1. The additional Sustainability Appraisal (SA) work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements. Shropshire Council considers the options assessed appropriately align with the expectations of the Planning Inspectors as outlined within ID37.</p> <p>2. The Council considers the approach to identifying the geography within which reasonable sites may be located and the approach to identifying those sites proposed to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country is appropriate. This is summarised within the additional SA work.</p> <p>2. Shropshire Council also considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.</p> <p>3. The reasonable options assessed for proposed contributions to the unmet employment land needs forecast to arise in the Black Country and the reasonable options assessed for the proposed employment land requirement within the additional SA work, relate to gross site areas. Similarly the proposed employment land requirement within the draft Shropshire Local Plan relates to gross employment area; as do references to proposed allocations. As such, the Council consider it is clear that the proposed contribution of 30ha of employment land to the unmet needs forecast to arise in the Black Country is a gross site area contribution and SHF018b&SHF018d is of an appropriate size to accommodate such a contribution.</p> <p>4. The options considered to accommodate the proposed 500 dwelling uplift to the proposed housing requirement included option 3: Increasing Site Allocations - which involved considering opportunities to extend the site area of proposed allocations in order to increase their capacity and/or opportunities to identify additional site allocations.</p> <p>5. The proposed contribution to the unmet needs forecast to arise within the Black Country are informed by the Duty to Cooperate process undertaken with the Black Country, this additional SA work and the planning judgement exercise summarised within the Housing and Employment Topic Paper. Any future contribution to the Black Country will be informed by a similar process during the preparation of a new Development Plan for Shropshire.</p> <p>6 and 7. Shropshire Council considers the proposed development strategy for Shifnal is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed areas of safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed. The Council considers that the SFRA undertaken</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						<p>the future housing needs of Shropshire (paragraphs 5.23 – 5.27 of the Updated Green Belt Topic Paper). However, no such provision is made to meet future needs of the Black Country, despite certainty there will be future unmet need.</p> <p>6. Has SA reassessment of our previous concerns about safeguarding land to the south/west of Shifnal (and alternatives) occurred?</p> <p>-Deliverability of this proposed safeguarded land is highly questionable: it was based on the delivery of a new strategic highway providing a bypass to the south-west of Shifnal (paragraph 5.215 of the Regulation 19 draft plan), however understand this is no longer proposed and not all necessary land required for the bypass is safeguarded.</p> <p>-Sustainability Appraisal was underpinned by an outdated Strategic Flood Risk Assessment (SFRA) which was not informed by the latest hydraulic modelling and flood risk data - important as proposed safeguarded land is constrained by Wesley Brook (paragraph 5.207 of the Regulation 19 plan).</p> <p>-This is an unsound approach and failure of process, particularly given the opportunity both sites present in meeting the needs of either the Black Country or Shropshire.</p> <p>7. Two sites are promoted for residential development, these are: Upton Lane at Shifnal (45ha capable of accommodating up to 700 dwellings); and Newport Road at Cosford (21ha capable of accommodating up to 426 dwellings). Concerns raised are even more pressing grounds to modify the draft Shropshire Local Plan to identify land at Upton Lane, Shifnal and Newport Road, Cosford as housing allocations or, at the very least, release them from the Green Belt and safeguard them for future development.</p>	<p>to inform the draft Shropshire Local Plan is appropriate and robust, supported by a clarification note.</p>	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A045	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12, 12.23, 13, 13.46 and 13.56, Tables 12.1-12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.73h, 8.84, and 16.64-16.65 and Tables 8.1-8.3 of the updated Housing and Employment Topic Paper. Paragraphs 2.1-2.12, 4.7-4.10, 4.14-4.21, 5.3b, 5.8, 5.16, 5.23-5.27, 6.1, 6.4-6.8, 6.13 and 6.19d and Table 4.1 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Shropshire Council has undertaken detailed, rigorous and extensive additional assessment and provided clear evidence it has met the detailed requirements of the Planning Inspectorate.</p> <p>2. Section 12 (including Tables 12.1-12.3) of the additional Sustainability Appraisal (SA), paragraphs 16.64-16.65 of the Housing and Employment Topic Paper, and paragraphs 4.14-4.21 and Table 4.1 of the Green Belt Topic Paper show a comprehensive assessment methodology and process (not limited to proposed allocations) to identify sites to accommodate contributions to the Black Country. Paragraphs 2.1-2.12 and 5.16 of the Green Belt Topic Paper demonstrate a sound and appropriate assessment of the exceptional circumstances (consistent with national policy) for releasing Green Belt land for both Shropshire need and proposed contributions to the Black Country. Support the conclusions regarding these sites and fully agree Albrighton is not an appropriate location (consistent with paragraph 6.13 of the Green Belt Topic Paper and supported by the data in paragraph 12.23 of the additional SA which demonstrates net % migration is from Albrighton to the Black Country).</p> <p>3. Agree with paragraph 4.14 of the Green Belt Topic Paper, settlement housing guidelines should be informed by the proposed spatial strategy. Tables 8.1-8.3 of the Housing and Employment Topic Paper and Table 12.4 of the additional SA identify the housing guideline for Albrighton and demonstrate it is deliverable. Agree proposed allocation ALB017&ALB021 is suitable to meet Albrighton housing needs (its density is higher than most allocations, so the settlement is delivering more than its fair share) through phased development over years 1-10 and less development in later years. Agree employment should be provided at RAF Cosford. Also support identification of safeguarded land (for development beyond 2038, which is critical to ensure longer term needs can be met) as per section 5 (particularly paragraphs 5.24-5.25) and paragraphs 6.5-6.8 of the Green Belt Topic Paper. Agree with paragraph 6.19d of the Green Belt Topic Paper that once adopted, no review of Green Belt boundaries will be required at the end of the plan period.</p> <p>4. Paragraphs 8.73h, 8.84 and 16.64 of the Housing and Employment Topic Paper and paragraphs 6.1, 6.4 and 6.6 of the Green Belt Topic Paper confirm Albrighton is a village surrounded by the Green Belt and this constitutes a constraint to further development and important to its long term sustainability - agree with this conclusion and consider no additional housing sites should be released from Green Belt at Albrighton. Also agree with paragraph 5.3b of the Green Belt Topic Paper, that Green Belt around Cosford needs to be protected.</p> <p>5. Section 13 of the additional SA shows a comprehensive assessment of options for the strategic distribution of development. Concur with conclusion in paragraph 13.46 that urban focus is appropriate.</p> <p>6. Appendix 3 of the additional SA shows a comprehensive assessment of sites P36A and P36B. Support the conclusion they are not suitable for development (perform strong Green Belt purpose, high quality agricultural land, poorly relate to Albrighton, impact on heritage assets, and reduce separation between Albrighton and Boningale); alternative options for development/safeguarding are identified to meet Albrighton's needs; and alternative more appropriate sites are identified to accommodate proposed contributions to the Black Country.</p> <p>7. Support increase to the housing requirement summarised in paragraphs 7.63-7.64 of the Housing and Employment Topic Paper, as it is proposed to be accommodated in an appropriate and sustainable manner. Note some developers have expressed concerns about increasing density of site allocations to achieve this, but disagree with this position and would note that the proposed approach is based on evidence of the amount of windfall development in the county/increased number of houses within planning applications.</p>	1-7. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A046	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65 and Tables 8.1 and 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it has been informed by community engagement, is consistent with national policy, has been informed by engagement with the wider West Midlands, and clearly defines locations for development ensuring housing needs are met to 2038 and beyond, whilst maintaining control of the locations and densities of development and protecting the Green Belt.</p> <p>2. With regard to paragraphs 12.1-12.3 and Table 4 of the additional Sustainability Appraisal (SA); paragraphs 7.63-7.64 and 8.7-8.8 and Tables 8.1 and 8.3 of the Housing & Employment Topic Paper; and paragraphs 4.14-4.21, 5.24-5.27 and 6.4-6.8 of the Green Belt Topic Paper; the Council has proposed 500 dwellings in Albrighton over the plan period and assessed sites and identified proposed allocations to meet this without impacting on the character and environment of the village (development of proposed allocations should be built steadily over 10 years and then less development to 2038). Consider there is no requirement for large employment sites at the village. Agree land should be 3 areas safeguarded for development after 2038. No others are required - particularly in the Green Belt.</p> <p>3. Appendix 3 of the additional SA demonstrates sites P36A and P36B have been assessed and it was determined they are not appropriate for development - alternative non-Green Belt sites available, should be retained as fields/Green Belt, proximity to listed buildings and a conservation area, and lack of sufficient infrastructure/traffic impact.</p> <p>4. Agree contributions to unmet housing needs of the Black Country should be accommodated in Tasley, Shrewsbury and the former Ironbridge Power Station. As per paragraph 6.13 of the Green Belt Topic Paper, Albrighton is not the right place to accommodate these contributions, and there are better sites elsewhere.</p> <p>5. Protection of Green Belt at Albrighton is essential for farming areas, the character of the village, natural surrounding landscapes and the environment and protection against climate change.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A047	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64 of the updated Housing and Employment Topic Paper. Paragraphs 6.4-6.8 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it provides sufficient housing to meet needs to 2038 in Albrighton and Boningale, but ensures control over decisions and direct development to the right place. It also protects the Green Belt, which is vitally important for health & wellbeing and food security (reference to paragraphs 6.4-6.8 of the Green Belt Topic Paper).</p> <p>2. Agree with paragraphs 12.1-12.3 of the additional Sustainability Appraisal (SA) the best sites to accommodate contributions to the housing needs of the Black Country are at Tasley, Shrewsbury and the Former Ironbridge Power Station, using appropriate brownfield sites.</p> <p>3. Support proposed increase to the housing requirement documented in paragraphs 7.63-7.64 of the Housing and Employment Topic Paper. Not opposed to housing development provided it is planned well and appropriately located.</p>	1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A048	B001	General comment	General comment	Not Specified	Not Specified	1. Records indicate there are coal mining features present at surface and shallow depth in Shropshire which may pose a potential risk to surface stability and public safety. However, it is noted this consultation seeks views on specific documents about which we have no comments.	1. Noted.	No
A049	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 6.4-6.8 and 6.13.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan, to safeguard the countryside.</p> <p>2. It is important that the draft Shropshire Local Plan prevents over-development at Albrighton (paragraphs 4.14-4.21) in order to protect the character and sense of community of the village. Precious Green Belt around Albrighton should not be built-on (paragraphs 6.4-6.8), including to satisfy any Black Country housing needs (paragraph 6.13).</p>	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A050	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 2.14-2.15, 2.28-2.29 and 16.64-16.65 of the updated Housing and Employment Topic Paper. Paragraphs 4.15-4.21 and 6.5-6.15 of the updated Green Belt Topic Paper.	Yes	Yes	<ol style="list-style-type: none"> 1. Fully support the conclusions and recommendations of these reports. 2. Paragraphs 12.1-12.4, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal (SA); paragraphs 2.14-2.15 and 2.28-2.29 of the Housing and Employment Topic Paper; and paragraphs 4.14-4.21 of the Green Belt Topic Paper identify suitable sites to accommodate the proposed housing contributions to the Black Country - without incursions into the Green Belt. Whilst paragraphs 6.5-6.19 of the Green Belt Topic Paper refute Albrighton as a sensible location for such provision. 3. Paragraph 16.64 of the Housing and Employment Topic Paper effectively addresses the issue of extra employment land at Albrighton. 4. Support the concept of Green Belt and endorse the conclusion in paragraph 6.6 of the Green Belt Topic Paper, regarding no land being released from the Green Belt to achieve the proposed settlement strategy for Albrighton. 	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A051	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 5.1-5.15 and 6.4-6.8 of the updated Green Belt Topic Paper. Paragraphs 12.1-12.3 and Appendix 3 of the additional Sustainability Appraisal.	Yes	Yes	<ol style="list-style-type: none"> 1. Fully support the draft Shropshire Local Plan which is robust and sound. Also support these reports. 2. With regard to paragraphs 5.1-5.15 of the Green Belt Topic Paper, the draft Shropshire Local Plan meets current and future needs of Albrighton. 3. Support decision that P36A and P36V are not appropriate for development within Appendix 3 of the additional Sustainability Appraisal (SA) document. These sites flood and are the wrong location for development. 4. With regard to paragraphs 12.1-12.3 of the additional SA and 6.4-6.8 of the Green Belt Topic Paper, concerned about impact of development on amenities and infrastructure, and character of the village so pleased no additional development is proposed in the village to 2038. Green Belt must be protected and pleased the draft Shropshire Local Plan seeks to achieve this - development should be directed to brownfield sites. 	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A052	B001	General comment	General comment	Not Specified	No	<ol style="list-style-type: none"> 1. Strongly oppose application for building houses on the Green Belt at Alveley. There has already been recent development/other proposals. Consider there is no requirement for this housing and existing provision for sports and recreation. Countryside should not be used to build houses. 	1. Noted. No specific changes are proposed to the proposed strategy for Alveley as a result of the additional material that was the subject of this consultation.	No
A053	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8 and 16.64-16.65 and Tables 8.1 and 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<ol style="list-style-type: none"> 1. Fully support the draft Shropshire Local Plan - it is vital the development is proportionate and sustainable, does to stress local services and does not negatively affect Green Belt/environment. 2. Consider the sites proposed to accommodate contributions to the housing needs of the Black Country (Tasley, Shrewsbury and Ironbridge Power Station) are by far the most suitable. 3. Not against housing development at Albrighton, but it needs to be proportionate to services and protect green spaces (which were assessed as lacking in 2004 and have reduced since). Table 12.4 of the additional Sustainability Appraisal (SA) indicates Albrighton has been allocated sustainable sites for housing development. Given sites identified in paragraph 12.3 of the additional SA, consider no other sites need to be identified (particularly in the Green Belt). 4. Appendix 3 of the additional SA assesses sites P36A and P36B as not suitable. Given the importance of retaining Green Belt wherever possible, consider these sites should not be developed. 	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A054	B001	Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 8.7-8.8 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan and consider it will effectively achieve sustainable development whilst complementing the natural environment. Proposed allocations are locations where proportional and thoughtful development will add value to the communities in which they are located, whilst protecting the surrounding environment/Green Belt.</p> <p>2. Paragraphs 8.7-8.8 of the Green Belt Topic Paper: development should be delivered on brownfield/non-Green Belt land and in more urban locations. Development on the Green Belt at Albrighton would be unsustainable and irreversibly impact on the local environment and community.</p> <p>3. Paragraphs 4.14-4.21 of the Green Belt Topic Paper: Agree with the locations identified (Tasley, Shrewsbury and the former Ironbridge Power Station) to accommodate proposed housing contributions to the Black Country. Appropriate sites for development across the County have been identified, development outside these locations should be resisted.</p>	1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A055	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comment	No	No	<p>1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.</p>	1. Noted, see response to A0153.	No
A056	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comment	No	No	<p>1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.</p>	1. Noted, see response to A0153.	No
A057	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraph 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63 and 16.64 of the updated Housing and Employment Topic Paper. Paragraphs 5.24-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. The draft Shropshire Local Plan provides for controlled development that supports economic and social growth without changing the essence of Albrighton. Support expansion, but it must be done slowly so that infrastructure, services and communities have time to adjust. As such, support allocation ALB017&ALB021 at Albrighton and also support the three proposed areas of safeguarded land for development after 2038.</p> <p>2. Support protection of the Green Belt within the draft Shropshire Local Plan - development of other sites at the village (particularly in the Green Belt) is opposed.</p> <p>2. No need for employment sites at Albrighton, the old Cosford RAF site is well located for this, much underused and benefits from easy access to the M54 and associated employment sites. Oppose facilities (such as a supermarket) on the outskirts of the settlement which would undermine the village centre.</p> <p>3. Proposals for a new secondary school at Albrighton are unviable, available resources should be used to support existing facilities.</p> <p>4. Housing to meet the needs of the Black Country should not 'eat' into the Green Belt.</p>	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A058	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.24-5.27, 6.4-6.8 and 6.13.	Yes	Yes	<p>1. Support the plan as it protects the Green Belt, which is vital to the health and wellbeing of current and future generations and wildlife.</p> <p>2. Support the proposed allocations in the draft Shropshire Local Plan.</p>	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A059	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.24-5.27, 6.4-6.8 and 6.13.	Yes	Yes	<p>1. Productive farmland at Albrighton is picturesque and a vital resource for present and future. Support the draft Shropshire Local Plan which seeks to ensure this land is undeveloped after 2038, which aligns with the commitment to preserve the natural beauty/ecological balance of Albrighton.</p>	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A059	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.4	Yes	Yes	<p>1. Relieved sites in Tasley, Shrewsbury and the Former Ironbridge Power Station chosen to accommodate contributions to the Black Country (paragraphs 12.1-12.3).</p> <p>2. Support the draft Shropshire Local Plan and consider development contrary to it should be refused. Consider organic sustainable growth to 2038 will achieve housing required in the village and concerned about proposals to develop the Green Belt at Albrighton, contrary to the draft Shropshire Local Plan. Such sites are unsuitable and would have a severe impact on the village - traffic, overburdening infrastructure and demise of the high street.</p>	<p>1. Noted.</p> <p>2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A059	B003	Updated Housing and Employment Topic Paper.	Paragraphs 7.63-7.64, 8.7-8.8, 16.64 and Tables 8.1 and 8.3	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it identifies allocated sites for current and future needs to 2038. Development at Albrighton should be phased prioritising immediate needs and then gradually meeting future needs. Development proposals in the Green Belt (including for schools, supermarkets or medical centres) contrary to this plan should be refused as they would drastically alter the village.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A059	B004	Updated Green Belt Topic Paper.	Paragraphs 5.24-5.27, 6.4-6.8 and 6.13	Yes	Yes	<p>1. Development proposals contrary to the draft Shropshire Local Plan should be refused. Housing should be directed to existing and proposed allocations; and employment to Cosford. Safeguarded land should not be developed until after 2038. Green Belt at Albrighton is an asset (health and wellbeing) to be protected.</p> <p>3. Agree there are more appropriate locations than Albrighton to accommodate proposed contributions to the Black Country - Tasley, Shrewsbury and the Former Ironbridge Power Station.</p> <p>2. Sites P36A and P36B are disproportionate in scale to the village; would remove productive farmland, mature trees/hedgerows and wildlife habitat; and negatively affect infrastructure.</p>	<p>1 and 3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p> <p>2. Noted.</p>	No
A060	B001	Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 8.3 and 6.4-6.8	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it protect the Green Belt, essential for health and wellbeing. However, recognise the need for considered and measured sustainable and affordable housing.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A061	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.3	Yes	Yes	<p>1. Oppose development in the Green Belt, it is unnecessary and wrong and will detract from the settlement and community. Support the draft Shropshire Local Plan in controlling future development at Albrighton.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A062	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8	Yes	Yes	<p>1. Value green spaces at Albrighton. Support the draft Shropshire Local Plan as it includes considered development phased over a period of time.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A063	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comment relating to proposed allocation BAY039	Yes	Yes	<p>1. Rationale behind identification of Green Belt/agricultural land to the west of Lyth Hill Road (BAY039) as a proposed allocation for 100 dwellings needs to be considered. The adopted Development Plan recognises Bayston Hill is constrained by the A49 and a major quarry to the east. A previous proposal on this site was refused in 2017, with grounds including loss of higher quality agricultural land and being contrary to the National Planning Policy Framework (NPPF). Other concerns with the site related to highway impact, infrastructure impact, ecological impact, loss of light/shading of nearby properties, flood risk impact (exacerbated by impermeable surfaces on the site and climate change), and loss of productive farmland. Feel the site should be retained as agricultural land or turned into a nature reserve. The examination needs to consider how circumstances have changed so this site could now be considered sustainable.</p> <p>-Response supported by a submission made to the Planning Application (reference 24/00765/FUL) pending consideration on BAY039 by a member of the respondent group. This raised concerns about suitability of and highway issues at Lyth Hill Road and the A49 (and the junction of the two - which was acknowledged as a constraint in the adopted Development Plan); and impact on Lyth Hill nature reserve.</p> <p>-Response supported by a report and associated petition of 176 residents, submitted to a Planning Application (reference 24/00765/FUL) pending consideration on BAY039. This report raises concerns regarding the road network, particularly Lyth Hill Road and the A49 (and the junction of the two); foul water drainage; surface water drainage; over-development of the village; loss of open countryside/agricultural land; loss of views from the public footpath; impact of traffic/construction traffic; lack of need for market housing (although there is a limited need for affordable housing); impact of village amenities; and conflict with adopted Development Plan policies.</p> <p>-Response supported by a submission on flooding on Lyth Hill Road, submitted to a Planning Application (reference 24/00765/FUL) pending consideration on BAY039. This raised concerns about flood risk resulting from the development.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Bayston Hill as a result of the additional material that was the subject of this consultation.</p> <p>1. Shropshire Council considers the proposed development strategy for Bayston Hill is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Proposed allocations have been informed by a proportionate and robust site assessment process.</p>	No
A064	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.24-5.27, 6.4-6.8 and 6.13.	Yes	Yes	<p>1. Value the character and community of Albrighton.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A065	B001	General comment	General comment	Yes	Yes	<p>1. Support the draft Shropshire Local Plan.</p> <p>2. Believe the Green Belt should only be developed when other options such as brownfield sites have been exhausted. Once gone, it is gone.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A066	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8 and 16.64-16.65 and Tables 8.1 and 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. The draft Shropshire Local Plan is an important document that shapes planning decisions and protects matters of local importance such as housing development, green spaces and Green Belt (which stops urban sprawl and ensures development is proportionate). Development should occur in accordance with this plan, including at Albrighton.</p> <p>2. Considers the additional Sustainability Appraisal (SA) is informed by comprehensive community engagement and assessment of housing sites. All sites are assessed and the sites identified in Table 12.4 of the additional SA and paragraphs 5.24-5.27 of the Green Belt Topic Paper to accommodate contributions to the Black Country at Tasley, Shrewsbury and the Former Ironbridge Power Station are the best locations. Albrighton is not an appropriate place to accommodate such a contribution.</p> <p>3. The proposed allocations (ALB017&021) at Albrighton are good choices, they should be phased over 10 years to minimise impact with less development to 2038. Agree the 3 identified areas of land should be safeguarded for development after 2038 (as per paragraphs 6.4-6.8 of the Green Belt Topic Paper). Commercial development should be directed to RAF Cosford/smaller ad hoc sites. Consider no other sites should be developed at Albrighton and particularly in the Green Belt or to accommodate contributions to the Black Country.</p> <p>4. Sites P36A and P36B are assessed in Appendix 3 of the additional SA, and it was concluded they should not be developed. These sites are not suitable for housing and should be retained as agricultural fields/Green Belt so as not to jeopardise food production.</p> <p>5. With regard to paragraphs 7.63-7.64 of the Housing and Employment Topic Paper, support the proposed 500 dwelling increase to the proposed housing requirement.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A067	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8 and 16.64-16.65 and Tables 8.1 and 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan, a well-considered and positive document, informed by engagement with communities and nearby counties, and is consistent with national policy. Reassured it gives robust protection to Green Belt at Albrighton (a precious resource which maintains farmland, village character, the landscape, biodiversity and environmental sustainability). It clearly defines current and future sites for development at Albrighton, ensuring housing needs are met to 2038 and beyond whilst maintaining control of locations and densities. Development that is not consistent with this plan should be refused.</p> <p>2. With regard to paragraphs 12-1.12.3 of the additional Sustainability Appraisal (SA) sites have been thoroughly assessed and the best locations to accommodate housing contributions to the Black Country identified - Tasley, Shrewsbury and the Former Ironbridge Power Station. Albrighton is not an appropriate place to accommodate such a contribution.</p> <p>3. Table 8.1 of the Housing and Employment Topic Paper indicates 500 dwellings are proposed in Albrighton. In Table 12.4 of the additional SA, it is good that two allocations have been identified to meet the housing needs of Albrighton, they should be phased over 10 years to minimise impact with less development to 2038. Agree the 3 identified areas of land should be safeguarded for development after 2038 (as per paragraphs 6.4-6.8 of the Green Belt Topic Paper). Commercial development is not required at Albrighton and necessary infrastructure is not available, it should be directed to RAF Cosford or smaller ad-hoc sites. No other sites should be developed at Albrighton and particularly in the Green Belt or to accommodate contributions to the Black Country.</p> <p>4. Sites P36A and P36B are assessed in Appendix 3 of the additional SA, and it was concluded they should not be developed. These sites are not suitable for housing and not required, so should be retained as agricultural fields/Green Belt. They are important to Albrighton but distant from the centre, in proximity of listed buildings and a conservation area, and would create traffic problems.</p> <p>5. With regard to paragraphs 7.63-7.64 of the Housing and Employment Topic Paper, support the proposed 500 dwelling increase to the proposed housing requirement, this is not an over-large increase and demonstrates we are not against housing, it just needs to be well planned.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A068	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8 and 16.64-16.65 and Tables 8.1 and 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan, a well-considered and positive document, informed by engagement with communities and nearby counties, and is consistent with national policy. Reassured it gives robust protection to Green Belt at Albrighton (a precious resource which maintains farmland, village character, the landscape, biodiversity and environmental sustainability). It clearly defines current and future sites for development at Albrighton, ensuring housing needs are met to 2038 and beyond whilst maintaining control of locations and densities. Development that is not consistent with this plan should be refused.</p> <p>2. With regard to paragraphs 12-1.12.3 of the additional Sustainability Appraisal (SA) sites have been thoroughly assessed and the best locations to accommodate housing contributions to the Black Country identified - Tasley, Shrewsbury and the Former Ironbridge Power Station. Albrighton is not an appropriate place to accommodate such a contribution.</p> <p>3. Table 8.1 of the Housing and Employment Topic Paper indicates 500 dwellings are proposed in Albrighton. In Table 12.4 of the additional SA, it is good that two allocations have been identified to meet the housing needs of Albrighton, they should be phased over 10 years to minimise impact with less development to 2038. Agree the 3 identified areas of land should be safeguarded for development after 2038 (as per paragraphs 6.4-6.8 of the Green Belt Topic Paper). Commercial development is not required at Albrighton and necessary infrastructure is not available, it should be directed to RAF Cosford or smaller ad-hoc sites. No other sites should be developed at Albrighton and particularly in the Green Belt or to accommodate contributions to the Black Country.</p> <p>4. Sites P36A and P36B are assessed in Appendix 3 of the additional SA, and it was concluded they should not be developed. These sites are not suitable for housing and not required, so should be retained as agricultural fields/Green Belt. They are important to Albrighton but distant from the centre, in proximity of listed buildings and a conservation area, and would create traffic problems.</p> <p>5. With regard to paragraphs 7.63-7.64 of the Housing and Employment Topic Paper, support the proposed 500 dwelling increase to the proposed housing requirement, this is not an over-large increase and demonstrates we are not against housing, it just needs to be well planned.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A069	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3	Yes	Yes	<p>1. Support the draft Shropshire Local Plan, which responds to community views and allows for controlled development in Albrighton to meet needs without overwhelming the community, local environment/natural habitats, farmland and Green Belt.</p> <p>2. Paragraphs 12.1-12.3 identifies other areas around the county to accommodate development, particularly the Former Ironbridge Power Station. Consider these are better options than loading development on one or two villages.</p> <p>3. Table 12.4 addresses housing sites at Albrighton, that meet local needs but no more is required.</p> <p>4. Sites P36A and P36B are assessed in Appendix 3 of the additional SA, and it was concluded they should not be developed, which is supported. they are in the Green Belt/farmland, are distant from the centre, will not support community spirit and would cause havoc.</p>	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A069	B002	Updated Housing and Employment Topic Paper.	Paragraphs 7.63-7.64, 8.7-8.8 and Tables 8.1 and 8.3	Yes	Yes	<p>1. Support the draft Shropshire Local Plan, which allows for controlled development in Albrighton to meet needs without overwhelming the community or ruining Green Belt (paragraphs 7.63-7.64).</p> <p>2. Tables 8.1 and 8.3 identify existing/proposed allocations at Albrighton, consider these will meet needs. No need for development in the Green Belt which would ruin the village.</p>	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A069	B003	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13	Yes	Yes	<p>1. Support the draft Shropshire Local Plan. Sufficient sites have been identified for Albrighton (existing and proposed allocations) and the village could be ruined by being overwhelmed by a huge development all at once (paragraphs 6.4-6.8 and 6.13). Consider better sites are available for new housing to meet unmet need outside the Green Belt, such as around Tasley and the newly available Ironbridge Power Station (paragraphs 4.14-4.21, 6.4-6.8 and 6.13).</p> <p>2. With regard to safeguarded land in paragraphs 5.24-5.27, this should not be developed until after 2038. The current plan proposals are sufficient to then.</p>	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A070	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Sections 6 and 12. Appendices 1 and 12.	Yes	No	<p>1. Consider the two reasonable options for contributions to the housing and employment land needs of the Black Country are appropriate, having regard to the justification provided at paragraphs 6.2-6.8 and various Duty to Cooperate (D2C) background documents with the Black Country authorities. Given D2C discussions, consideration of alternative contributions (lower or greater) would not be a reasonable alternative as requests for an alternative number of homes have not been made by the Black Country authorities as set out in the relevant Statement of Common Ground (EV041).</p> <p>2. The assessment geography for sites to accommodate contributions to the Black Country is considered appropriate, however the available data (including analysis in the response) is clear that the functional relationship with the Black Country is significantly greater in the eastern component of this area. Also support approach to focusing on urban locations/potential strategic sites as described in paragraphs 12.32-12.34, this approach recognises the urban focus of the draft Shropshire Local Plan and highlights the ability for such locations to sustainably accommodate such development.</p> <p>3. No significant concerns regarding the assessments of each sites ability to accommodate contributions to the Black Country and support identification of BRD030 (Tasley Garden Village) for this purpose. However, have concerns about the distribution of contributions across these sites. BRD030 has by far the best functional relationship based on available data (including analysis in the response) and is best placed to meet the needs of the Black Country, but is to accommodate the same contribution as the Former Ironbridge Power Station site. Given this strong functional link, and level of services and employment opportunities in Bridgnorth, consider a greater proportion of this contribution should be accommodated at BRD030 (including the land identified as a Potential Future Direction of Growth). This would require an increase to the overall housing numbers at BRD030 to meet these needs and those of existing Shropshire residents. It is considered that estimated completion rates for BRD030 are overly cautious and development would be completed by 2034/35 at the latest.</p> <p>4. Consider BRD030 is incorrectly scored for criterion 3 and 5 of the updated Stage 2a assessment for housing and employment (Appendices 1 and 2), noting that there are no Tree Preservation Orders on the site or its boundary and the distance to the children's playground to the north of the A458. This would not alter the conclusion of the range the site falls in.</p> <p>5. The assessment of BRD030 in Appendix 4 was partly updated to reflect refusal at appeal of proposed poultry units on BRD030, however sub-reasoning on this matter is now incorrect. This needs updating as this has implications for the wording of draft Policy S3.</p>	<p>1-2. Noted.</p> <p>3. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.</p> <p>4. The Council considers that the Stage 2a assessment is proportionate and robust, as noted changes to these criteria would not alter the conclusion category for the site.</p> <p>5. Noted. Given that the Planning Application for Poultry Units within BRD030 has been refused, the Council is proposing a main modification to remove the proposed site guideline for BRD030 which related to this matter.</p>	Yes
A070	B002	Updated Housing and Employment Topic Paper.	Sections 7, 8, 9 and 16	Yes	No	<p>1. Paragraphs 7.35-7.36 appropriately considers the relationship between identified issues and opportunities in Shropshire and housing contributions to the Black Country. One issue is attracting families into Shropshire, migration data (within the response) supports the link, with Black Country migrants of a younger age profile than existing residents of Shropshire. However, this needs to be considered in the context of housing mix for sites to accommodate Black Country contributions (ensuring sufficient family homes of an appropriate scale to attract working age and younger families). To ensure sites deliver an appropriate mix of</p>	<p>1 and 5. Shropshire Council considers the proposed residential mix for sites of 5 or more dwellings in draft Policy DP1 provides an appropriate balance between ensuring new development includes an appropriate mix of dwellings to meet the needs of communities, providing certainty to all (the decision maker, local communities and the development industry) and also allowing flexibility for innovation within development. Specifically, flexibility and innovation exists in that the specific housing mix is defined for 50% of open market housing, with the remaining 50%</p>	No

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						<p>housing to help meet need, housing mix policy (DP1) or site specific policies for relevant sites will need to be updated to recognise the differing requirements of those moving from the Black Country, which are more likely to be working-age than the current population and therefore have different housing requirements.</p> <p>2. Support identification of Option 3b (31,300 dwellings) as the appropriate housing requirement and the reasoning in paragraph 7.59. Agree that there is a requirement to update draft Policy SP2 and its supporting text plus the explanatory text to draft Policy SP7 to reflect the updated housing requirement. However, given delays through the examination process, there is a requirement to extend the plan period to 2040 so it addresses at least 15-years post adoption (in accordance with paragraph 22 of the National Planning Policy Framework). It is considered sufficient sites to accommodate this could be identified in a timely manner without causing unnecessary delay to adoption of the draft Shropshire Local Plan.</p> <p>3. Consider the four options for accommodating the uplift to the housing requirement are appropriate. However, date on windfall completions includes developments that were granted when the Council was unable to demonstrate a 5 Year Housing Land Supply, as such these trends are unlikely to continue. Consider the delivery rates identified for BRD030 in Table 8.3 are overly cautious, the site would be completed by 2035/36 which means it could deliver housing (at least 270 dwellings) as part of or all of the Potential Future Direction of Growth area could be used to achieve the uplift to the proposed housing requirement.</p> <p>4. Due to its location, commuting and existing migration patterns BRD030 has the strongest functional link with the Black Country of the sites identified to accommodate the proposed housing contribution to this area. As such, consider a greater proportion of these unmet needs could and should be accommodated on BRD030, including the potential future direction of growth, to ensure these and local needs are met.</p> <p>5. Endorse and agree with the reasoning and conclusions of paragraph 16.81 that BRD030 does not represent an appropriate location to accommodate employment contributions to the Black Country. Connectivity by road and rail, and in particular motorway access, are likely to be key determining factors for those businesses looking for space within Black Country to be accommodated in Shropshire.</p>	<p>to include a suitable mix and variety of dwelling sizes. This mix can respond to such factors as site specific characteristics, local need and market demand (including from the Black Country).</p> <p>1. Paragraph 2a of the draft policy allows the residential mix on a site to positively respond to the most recent information on local housing need for communities, where in the last 5 years a Local Housing Need Survey has been undertaken under either the Right Home Right Place Council-led initiative or an equivalent survey endorsed by Shropshire Council. Paragraph 2b of draft policy is informed by the SHMA, which indicates a significant proportion of new dwellings required during the proposed Plan period will be 1-3 bedrooms in size. Specifically, the SHMA indicates around 32.7% of the dwellings needed will be 1 or 2 bedrooms in size and a further 43.5% will be 3 bedrooms in size. This demand for 1-3 bedroom dwellings also reflects the view often expressed by local communities when discussing their local housing needs.</p> <p>2. Shropshire Council considers the proposed plan period addressed within the draft Shropshire Local Plan is appropriate. Importantly:</p> <ul style="list-style-type: none"> -There is nothing in law requiring a Local Plan to have a minimum 15 year period from adoption. -The National Planning Policy Framework (NPPF) preference for a minimum 15 year period from adoption (paragraph 22) is not a mandatory requirement and shorter timescales can be sound, as established in other Local Plan examinations. The Council considers the primary intention of this preference is to ensure plans are forward-thinking; provide a long-term vision, strategy and basis for sound decision making; and do not unduly restrict growth. This is the case in the draft Shropshire Local Plan, with a spatial strategy underpinned by the principle of 'high-growth'. -The National Planning Practice Guidance (NPPG) on Plan Making addresses the plan period at paragraph 64, indicating that the focus is on ensuring that policies are 'forward thinking' and look over a minimum 15 year period. Again, this is the case in the draft Shropshire Local Plan which addresses a 22 year period and has since submission formed a material consideration in decision making. -The proposed plan period continues to align with that of the latter Regulation 18 and Regulation 19 consultations and crucially the submission version of the draft Shropshire Local Plan. -The proposed plan period aligns with the timescales for the proposed vision, objectives, policy framework and settlement strategies within the submission version of the draft Shropshire Local Plan. -The proposed plan period supports the continuation of the spatial strategy proposed within the submission version of the draft Shropshire Local Plan - consistent with the proposed retention of the 1,500 dwelling contribution towards the unmet housing need forecast to arise in the Black Country and the continuation of the 'high-growth' principle that underpins the spatial strategy. -This approach is a pragmatic response to the numerous factors that have had implications for the timescales of the plan making process and meant that adoption of the draft Shropshire Local Plan has not occurred when envisaged by the Council - which would have allowed for more than 15 years remaining within the plan period at adoption. In particular: <ul style="list-style-type: none"> >The Covid 19 pandemic which due to necessary measures to safeguard communities had led to direct delays at key stages in the plan making process; had significant implications on Council resources in order to support the response to the Covid 19 pandemic, leading to delays to the plan making process; and resulted in a specific extension to the 	

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							<p>timescales for the Regulation 19 consultation.</p> <p>>A number of lengthy and complex objections which required due consideration through the Regulation 19 consultation process and during the ongoing examination processes. This includes a Pre-Action Protocol letter which had a specific implication for the timescales of the examination.</p> <p>-This approach is also a pragmatic approach to avoiding the 'cycle' of examination timescales leading to extensions to plan periods, leading to extension of examination timescales.</p> <p>-This approach is also a pragmatic approach to seeking to positively progress the examination and adoption of the draft Shropshire Local Plan in order to facilitate implementation of the sustainable spatial strategy underpinned by the principle of 'high-growth'.</p> <p>-This approach positively responds to the requirement to review Local Plans every five years.</p> <p>Examples of other circumstances where such an approach has been employed include:</p> <p>-The Hart Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraph 32 of their report (published on 10th February 2020), stating: "There has been some suggestion that the Plan period should be extended. The Plan looks forward 13 years after anticipated adoption, which is below the preferred 15 year time period set out in Paragraph 157 of the NPPF. However, the NPPF's preference is not a set requirement and I consider 13 years to be an appropriate time scale in this instance, particularly as there is now a requirement to review plans every five years." Although the NPPF has been revised since the report, Shropshire Council is of the view that the wording relating to the 15 year time period remain largely unchanged.</p> <p>-The Worthing Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraphs 74-76 of their report (published on 14th October 2022), stating "Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption. As submitted, the Plan period runs from 2020 to 2036. It was anticipated that the Plan would be adopted in 2021 and thus would have met this requirement. The Plan has been prepared during the COVID-19 pandemic, which has had understandable consequences in terms of the preparation and submission of the Plan. This means that the Plan will now be adopted in 2022 and will thus have a lifespan of around 14 years. Although the period will now fall marginally short of the 15 years recommended by the NPPF, I conclude that this does not render it unsound. Delaying the adoption of the plan to address any implications for extending the period would be more likely to frustrate, rather than accelerate the delivery of new housing and employment in Worthing. This would be contrary to the Government's objective of significantly boosting the supply of housing and for Councils to have up-to-date plans in place. On balance, a plan period of up to 2036 would remain broadly consistent with the aims of paragraph 22 of the NPPF in allowing adequate time for the Plan's strategic policies to take effect."</p> <p>3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of</p>	

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							<p>settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>4. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.</p> <p>5. Noted.</p>	
A070	B003	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	Whole Policy	Yes	No	<p>1. The policy is too long, not precise and is unambiguous. Parts are unnecessary/too long.</p> <p>2. Significant concerns regarding the draft policy placing a requirement for 20% of homes to be delivered as specialist homes on sites over 250 dwellings. Strategic sites could provide opportunities for specialist housing, but the 20% requirement is not justified and could lead to over-provision on larger sites. Furthermore:</p> <ul style="list-style-type: none"> -This has not been tested through viability assessment and no evidence has been provided on the suitability of this new policy approach, as such there is no evidence this would not impact on viability. -Whilst larger sites have economies of scale they also have higher infrastructure costs. -There are circumstances where there is no demand for such provision. -This policy could delay delivery of these sites and reduce the number of market homes provided - particularly relevant on sites to accommodate contributions to the Black Country like BRD030 (migrants from the Black Country have a younger demographic than the Shropshire average). -There is no consideration of how such provision is currently delivered in Shropshire, these are usually on windfall sites. <p>3. Concerned about the need for 5% of houses to achieve M4(3) standards. To deliver such homes would require either an identified end user, or a restriction placed upon who can purchase those properties built to M4(3) standards, but developers cannot leave such properties empty until needed. A better alternative would be a S106 contribution for upgrading M4(2) properties when required.</p> <p>4. Part 19 of this draft policy appears to place restrictions on housing delivery on allocated sites exceeding either assumed capacities or settlement guidelines. This would unnecessarily restrict housing delivery and contradict recognition that the overall housing requirement is a minimum figure.</p>	<p>1. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.</p> <p>2 and 4. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Furthermore, within paragraphs 38-41 ID28 the Inspectors concluded that there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. Reflecting these factors, it is considered appropriate to specify the proportions of specialist housing expected on larger development sites.</p> <p>To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken.</p> <p>With regard to the optional building regulations accessible and adaptable housing standards, the proposed standards for general housing are specifically considered within the Whole Plan Viability Assessment. With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes that such housing will be "subject to a viability assessment at the point of a planning application", consistent with national guidance.</p> <p>The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations. However, the Council recognises that viability can vary between the different forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution which is responsive to needs and development viability.</p> <p>It is also important to note that many forms of specialist housing represent high-density development and as such can achieve effective use of land enhancing viability, may also constitute a proportion of the affordable housing contribution, and also represents an additional outlet on the scheme, which can increase the sites marker, have positive effects on deliverability, and speed-up timescales - which aligns with Government aspirations.</p> <p>However, it is acknowledged that there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such, the Council is proposing a modification to this draft Policy to allow for more flexibility regarding site</p>	Yes

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							<p>guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies.</p> <p>Furthermore, consistent with the conclusions of the Whole Plan Viability Assessment a modification is proposed to allow the provision of reduced rates of specialist housing provision where it is demonstrated that this is creating viability concerns for otherwise sustainable schemes.</p> <p>Furthermore, it is recognised that there may be circumstances where a specific site is unsuitable for specialist housing or there is no identified need for such housing in the area; as such the Council proposes a modification to this draft Policy to allow for the provision of reduced rates of specialist housing provision where the Council agrees one or both of these circumstances apply.</p> <p>3. With regard to M4(3) housing the SHMA calculates a total need for M4(2) and M4(3) housing equivalent to 77% of total household growth (of which M4(3) constitutes around 13%). It is recognised that part of this need can be met within specialist accommodation, however Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible. As such Shropshire Council considers the SHMA justifies requirements for all housing specifically designed for the elderly to achieve M4(3) standard and the proposed thresholds for M4(2) and M4(3) standard dwellings on sites of 5 or more dwellings.</p>	
A071	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comment	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A072	B001	Updated Housing and Employment Topic Paper.	Tables 8.1 and 10.2, paragraphs 16.60-16.80.	Yes	Yes	<p>1. Support the pragmatic, sound & well-considered strategy for Albrighton. It considers Green Belt, its location and unique characteristics, environment, heritage, infrastructure constraints, development needs and potential for accommodating growth and contributing to strategic objectives in eastern Shropshire. The 500 dwellings (including site allocation ALB017&ALB021) proposed represents sustainable growth, and proposed safeguarded land allowed for future growth.</p> <p>2. Proposals for Albrighton Place Plan area will contribute positively to the sustainable growth and prosperity of the area.</p> <p>3. Agree with emphasis on prioritisation of residential development to address previous low completion rates and acknowledgment of limited employment land opportunities.</p> <p>4. Mechanism for site assessment and rationale behind inclusion or exclusion from the development strategy is a comprehensive and transparent decision-making process.</p>	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

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A073	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.82-12.87	Yes	No	<p>1. The assessment of sites to accommodate proposed contributions to the Black Country considered all sites in the relevant assessment geography. As recognised in paragraph 12.84 of the additional Sustainability Appraisal (SA) it is not surprising sites identified for this purpose are proposed allocations. However, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Therefore, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire.</p> <p>2. There are sites appropriate to meet local needs outside the identified assessment geography associated with higher-tier settlements. One example is WEM035 at Wem, a sustainable settlement with unjustifiably low housing guideline.</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p> <p>2. Shropshire Council considers the proposed development strategy for Wem appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at Wem have been informed by a proportionate and robust site assessment process.</p>	No
A073	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Table 8.6	Yes	No	<p>1. Support the conclusion that a 'high-growth' strategy is the most sustainable. However, it is unclear why this is based on the 2020 assessment of Local Housing Need with an overlap between the uplift and proposed contribution to the Black Country. Consider this option should be 1,500 dwellings above the submission version of the draft Shropshire Local Plan - 32,800 dwellings or 1,491 dwellings per annum.</p>	<p>1. Shropshire Council considers the additional Sustainability Appraisal (SA) assessment assessed the reasonable options for the proposed housing requirement. These methodology for identifying these options is explained within the additional SA. In summary they are considered consistent with those considered within earlier stages of the SA process and positively respond to the guidance provided by the Inspectors in ID37.</p> <p>Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p>	No
A073	B003	Updated Housing and Employment Topic Paper.	Paragraph 7.61	Yes	No	<p>1. Support the conclusion that a 'high-growth' strategy is the most sustainable. However, it is unclear why this is based on the 2020 assessment of Local Housing Need with an overlap between the uplift and proposed contribution to the Black Country. Consider this option should be 1,500 dwellings above the submission version of the draft Shropshire Local Plan - 32,800 dwellings or 1,491 dwellings per annum.</p>	<p>1. Shropshire Council considers the additional Sustainability Appraisal (SA) assessment assessed the reasonable options for the proposed housing requirement. These methodology for identifying these options is explained within the additional SA. In summary they are considered consistent with those considered within earlier stages of the SA process and positively respond to the guidance provided by the Inspectors in ID37.</p> <p>Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p>	No
A073	B004	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 10.51-10.52	Yes	No	<p>1. Due to uncertainty about available land (brownfield land/windfall opportunities are taken-up and biodiversity net gain reduces potential), reliance on windfall allowances is not considered likely to result in a strongly positive effect on SA objective 3: provision of a sufficient amount of good quality housing. It is also difficult to ensure sufficient provision is made for specific groups, as provision is generally associated with larger sites. Consider increasing site allocations provides far more certainty as should be re-assessed accordingly.</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No

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A073	B005	Updated Housing and Employment Topic Paper.	Paragraphs 8.65-8.66	Yes	No	1. Due to uncertainty about available land (brownfield land/windfall opportunities are taken-up and biodiversity net gain reduces potential), reliance on windfall allowances is not considered appropriate - it lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). It is also difficult to ensure sufficient provision is made for specific groups, as provision is generally associated with larger sites. Consider increasing site allocations should be adopted to ensure that the Plan is justified, deliverable and effective.	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.	No
A073	B006	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 6.8	Yes	No	1. Assessment of 'reasonable' options to accommodate contributions to the Black Country is supported. However, it is considered the option of making no contribution should not be considered reasonable as it conflicts with the paragraph 11 of the National Planning Policy Framework. Aware that a shortfall remains/likely increasing in the Black Country. As such an uplift in Shropshire contribution would be a more reasonable consideration.	1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.	No
A073	B007	Updated Housing and Employment Topic Paper.	Paragraph 9.10	Yes	No	1. The assessment of sites to accommodate proposed contributions to the Black Country considered all sites in the relevant assessment geography. As recognised in paragraph 12.84 of the additional Sustainability Appraisal (SA) it is not surprising sites identified for this purpose are proposed allocations. However, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Therefore, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire. 2. There are sites appropriate to meet local needs outside the identified assessment geography associated with higher-tier settlements. One example is WEM035 at Wem, a sustainable settlement with unjustifiably low housing guideline.	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate. 2. Shropshire Council considers the proposed development strategy for Wem appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at Wem have been informed by a proportionate and robust site assessment process.	No
A074	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	No	1. Data on changes to the age of the Shropshire population between the 2011 and 2021 census point to the need to provide homes both for an ageing population but also to create the conditions and opportunity to attract younger families and the economically active. 2. The aspirations of this development plan policy are laudable it is drafted in a manner that is both wordy and granular and may not capture the broader aspirations the policy seeks - supporting independent living/personal choice/cohesive communities. Larger hub settlements such as Highley are more likely to fulfil these objective in the context of Shropshire a large and otherwise sparsely populated county. 3. Paragraphs 2-6 set out opportunities for accessible/adaptable housing. But all opportunities to support independent living are not captured, such as opportunities for down-sizing (in the community) or alternatively the provision of housing to meet the needs of extended families independently on the same site.	1-3. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. It forms part of the wider strategy to meet the housing needs of Shropshire. 3. Draft Policy DP1 addresses housing mix, with the intention of ensuring smaller housing which could facilitate downsizing.	No

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A074	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments	Yes	No	1. Highley has been recognised as a Community Hub settlement for development and site HNN016 designated as a proposed allocation in the draft Local Plan. The allocation of site HNN016 would contribute to meeting Shropshire's housing needs and also ensure that Highley benefits from a sufficient number of households in the settlement to maintain the vitality of the settlement's services and facilities and secure the future of the settlement.	1. Noted.	No
A074	B003	Updated Housing and Employment Topic Paper.	General comments	Yes	No	1. In principle support the proposed housing requirement, because higher growth has the potential to deliver more economically beneficial outcomes which is particularly relevant to a county with a rising proportion of economically inactive residents. 2. Consider the proposed approach to accommodating the proposed uplift to the housing requirement - increasing settlement guidelines/windfall allowances in three settlements (Shrewsbury, Whitchurch and Buildwas) is inappropriate, as there is a finite/dwindling supply of windfall sites and recent changes like biodiversity net gain reduces potential. This approach therefore lacks certainty and is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). It is considered this will be challenged in the context of Sustainability Appraisal, as it does not identify other locations and limits development. 3. Paragraph 7.24 indicates the Council's view that there is a correlation between greater growth and greater economic and social benefits but also greater environmental impact. This is not always the case.	1. Noted. 2 and 3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.	No
A075	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	No	No	1. Support recognition of the need to provide specialist housing to meet the needs of older residents in Shropshire and consider strategic development sites offer an ideal opportunity to combine market, affordable and specialist housing viably. However, object to the draft policy as worded. 2. The policy identifies the need for M4(2) and M4(3) properties to be 'dementia friendly' and the explanation provides a link to guidance produced by the Alzheimer's Society. However, consider there is insufficient evidence within the policy to allow for consistent application by decision makers. In the absence of updated viability evidence, it is unclear if the proposed M4(3) standards/'dementia friendly' design have been considered with regard to wider viability implications (policies should not make development unviable). Consider it is essential an addendum/update to the viability evidence is produced and sufficient flexibility is provided within the policy to allow for circumstances where deviation is justified through robust evidence. 3. Support delivery of homes for key workers. However, criterion 11 of the draft policy which expects such provision to be proactively considered to not allow for consistent application by applicants or decision makers. 4. Criteria 15 of the draft policy identifies specific requirement for provision of specialist housing (20%) on sites of over 250 dwellings. Unclear if this has been subject to viability testing. It is imperative that larger/strategic sites are not subject to overly-restrictive policy requirements such as this, given the need to deliver a range of infrastructure and facilities. Additional flexibility should be established in this policy to allow for application on a site-by-site basis. 5. Additional clarity is required with regard to the contribution that affordable units can make to the proposed requirement on strategic sites. 6. Support criterion 18 of the draft policy and consider it appropriate and justified where evidence supports additional development beyond the level of growth set out within the defined strategy, housing to meet the needs of specialist groups will be supported.	1-6. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. 2, 4 and 6. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Furthermore, within paragraphs 38-41 ID28 the Inspectors concluded that there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. Reflecting these factors, it is considered appropriate to specify the proportions of specialist housing expected on larger development sites. To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken. With regard to the optional building regulations accessible and adaptable housing standards, the proposed standards for general housing are specifically considered within the Whole Plan Viability Assessment. With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes that such housing will be "subject to a viability assessment at the point of a planning application", consistent with national guidance. The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations. However, the Council recognises that viability can vary between the different forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution which is responsive to needs and development viability. It is also important to note that many forms of specialist housing	Yes

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							<p>represent high-density development and as such can achieve effective use of land enhancing viability, may also constitute a proportion of the affordable housing contribution, and also represents an additional outlet on the scheme, which can increase the sites marker, have positive effects on deliverability, and speed-up timescales - which aligns with Government aspirations.</p> <p>However, it is acknowledged that there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such, the Council is proposing a modification to this draft Policy to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies.</p> <p>Furthermore, consistent with the conclusions of the Whole Plan Viability Assessment a modification is proposed to allow the provision of reduced rates of specialist housing provision where it is demonstrated that this is creating viability concerns for otherwise sustainable schemes.</p> <p>Furthermore, it is recognised that there may be circumstances where a specific site is unsuitable for specialist housing or there is no identified need for such housing in the area; as such the Council proposes a modification to this draft Policy to allow for the provision of reduced rates of specialist housing provision where the Council agrees one or both of these circumstances apply.</p> <p>5. The draft policy and associated explanation are clear on the inter-relationship between specialist housing and affordable housing - in effect housing can where appropriate constitute contributions to both these requirements provided it complies with the definition of both requirement.</p>	
A075	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments	No	No	<p>1. Consider approach to quantum of development planned for to be appropriate and justified. It demonstrates the Council continue to take a proactive approach to economic and social growth for existing and future residents.</p> <p>2. Having considered four options, the Council proposes to accommodate the uplift to the housing requirement through Option 1 increasing settlement guidelines and windfall allowances. Have significant concerns about this approach/conclusions set out in additional Sustainability Appraisal (SA) on this matter. These concerns include:</p> <ul style="list-style-type: none"> -With regard to meeting unmet housing needs, it is essential to ensure this occurs close to the source of the need and a reliance on windfall development does not allow for this to be controlled. -Insufficient justification/evidence provided to suggest sufficient windfall development will come forward. -Not positively prepared or justified to rely on existing commitments and windfall development to meet housing requirements. The Council need to demonstrate expected sources of windfall and detail previous rates across relevant settlements (Strategic, Principal and Key Centres and Strategic Settlements). -Windfall development potentially negatively impacts on provision of affordable housing (chronic under-supply in Shropshire and the Black Country) and wider infrastructure. These are benefits of allocating strategic scale sites (where affordable housing is required and additional infrastructure can be delivered). -May have a negative effect on protection and enhancement of the range of plants and animals/quality and extent of wildlife habitats; flood risk/improvement of flood management; air pollution/protection of air quality; and conservation and enhancement of landscape character and local distinctiveness. -Support allocation of development to most sustainable settlements in 	<p>1. Noted.</p> <p>2 and 3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>2. The Housing and Employment Topic Paper provides information on past windfall rates and known potential windfall sites (whilst acknowledging that this constitutes only a portion of potential windfall sites in these locations).</p> <p>4. The proposed approach to accommodating uplifts to the housing requirement does not rely on increasing density of proposed allocations. However, it is important to note that Shropshire Council has generally taken a precautionary approach to site capacity to ensure that the proposed housing requirement and proposed settlement guidelines are achieved. The specific number of dwellings and density of development that is appropriate on any proposed allocations will, if they are ultimately allocated, be determined at the Planning Application stage.</p> <p>5-7. Shropshire Council considers that a robust and proportionate approach has been undertaken to identify the geography within which reasonable site options to accommodate the proposed contribution to</p>	No

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						<p>Shropshire through settlement housing guidelines, but do not consider appropriate to limit sustainable development opportunities outside of defined guidelines. To do so would prevent their otherwise sustainable opportunities for growth (e.g. Tilstock).</p> <p>3. Support Option 3 identification of additional allocations to accommodate the proposed uplift to the housing requirement. This alternative has the potential to be beneficial for a variety of SA objectives (referenced). This should occur across the settlement hierarchy to provide assurance that the overall housing requirement will be delivered in full.</p> <p>4. Do not support intensification of existing allocations, where they meet the existing justified density set out in the Council's evidence base.</p> <p>5. Identified a range of inconsistencies with regard to the assessment of sites within the additional SA. Consider P36a/P36b should score 'good' within the stage 2a assessment due to the proximity and scale of the site.</p> <p>6. The three sites identified to accommodate the proposed contribution to the Black Country are not deliverable in the plan period; they are subject to constraints including archaeology, flood risk and drainage; land assembly is required; there has been insufficient consideration of viability/ability for to deliver policy compliant levels of affordable housing and wider infrastructure required to achieve sustainable development; and they do not make best use of the strategic connections with the Black Country.</p> <p>7. Support identification of additional sites to accommodate the proposed contribution to the Black Country. Contributions to the Black Country, should be met as close as possible in an area with strong structural, infrastructure and social connections. Land at Albrighton South (P36a and P36b) is currently subject to a planning application and promoted for a residential-led development of up to 800 dwellings, a secondary school, care home, supermarket and flexible employment space (site plan attached to response). The planning application is supported by an assessment which concludes release of the site from the Green Belt will have low-moderate impact and through on-site mitigation a materially lower impact than proposed allocations. The planning application is also supported by a range of technical assessments which support development of the site (identified in response). Given the sites physical proximity and sustainable connectivity (for work, access to family, and access to social networks for support) by road and rail to the Black Country, along with the Council's assessment of the development potential of this site/connectivity to the Black Country in the additional Sustainability Appraisal (SA) consider this site must be allocated for development to contribute to the needs of the Black Country to be found sound and the draft Shropshire Local Plan to be considered deliverable.</p>	<p>the Black Country could be located. It is notable that within ID37 the Inspectors indicated that they were content with the approach to identifying a reasonable assessment geography. Furthermore, Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>6 and 7. Shropshire Council is confident that the sites identified to accommodate proposed contributions to the Black Country are deliverable within the proposed period. Notably, the former Ironbridge Power Station now benefits from Outline Planning Permission and is the subject of a Reserved Matters Application for the first residential phase of development.</p>	

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A075	B003	Updated Housing and Employment Topic Paper.	General comments	Not Specified	Not Specified	<p>1. Support the high growth scenario and proposal to accommodate unmet need from the Black Country. However:</p> <ul style="list-style-type: none"> -The level of unmet need is increasing (reference to Wolverhampton Council Report), therefore reasonable to assume additional needs should be accommodated in the draft Shropshire Local Plan or future iterations. It is clear in the National Planning Policy Framework (NPPF) that the assessment of housing need should include unmet need from neighbouring local authorities, if it exists. -Contributions to unmet employment needs must be married with provision of housing. Whilst the Plan is being examined under previous iterations of the NPPF, the most recent iteration introduces the link between economic growth aspirations and housing need. National Guidance is also clear that the standard method for calculating housing need is a minimum and this is distinct from a housing requirement, with examples provided of when it is appropriate for this to be higher. <p>2. Support the approach being taken to the identified housing requirement. Consider adopting the high growth scenario and contributing to the Black Country is justified and demonstrates the Council are committed to ensuring Shropshire continues to be a place that people wish to work and live and it ensures significant socio-economic benefits associated with housing growth. Consider that the approach taken is justified, reasonable and is sound.</p>	1 and 2. Noted. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.	No
A075	B004	Updated Green Belt Topic Paper.	General comments	No	No	<p>1. The Green Belt Topic Paper does not review the assessment previously made in respect of the land at Albrighton South (P36a and P36b). The Council assessment of Green Belt is inconsistent with the Green Belt Assessment prepared to support the planning application. Have concerns about inconsistencies in the approach taken and suggest it is appropriate and fundamentally necessary for the Council to consider the release of land from the Green Belt at Albrighton.</p>	<p>1. Shropshire Council considers the methodology used in the Green Belt Assessment and Review undertaken to inform the draft Shropshire Local Plan is appropriate, proportionate and robust. Shropshire Council also considers that the proposed development strategy for Albrighton is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations and areas of safeguarded land have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p>	No

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A076	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	General comments	No	No	<p>1. Disagree with the Council's proposed approach to accommodating the proposed 500 dwelling uplift to the housing requirement though windfall development. This is not effective nor consistent with national policy and therefore cannot be considered sound in line with the NPPF. Concerns include:</p> <ul style="list-style-type: none"> -Whilst windfall development has been high in Shropshire since 2018/19 it has consistently and significantly decreased since (consider this trajectory will continue); a significant component of this was larger/medium scale sites which will deteriorate over time without policy intervention, i.e. through additional policy measures; and limited evidence is provided the windfall supply will continue. This is particularly important given paragraph 72 of the National Planning Policy Framework (NPPF) requires compelling evidence that windfall development will provide a reliable source of supply to justify its inclusion. -Whilst the windfall option inevitably performs best in the additional Sustainability Appraisal (SA), it is noteworthy that paragraph 10.51 concludes "none of the reasonable options identified for accommodating the uplift to the proposed housing requirement are likely to result in a strongly negative effect". -The additional SA assumes the windfall option performs better than the additional site allocations option due to increased certainty regarding the urban focus of development. However, this does not consider the potential for land outside settlements to be better located to access services and facilities and more likely to deliver sustainable development. <p>2. Consider further site allocations should be identified to accommodate the 500 dwelling uplift to the housing requirement and provide certainty regarding deliverability. This should include Land North of Aston Road, Wem (WEM038), which is bounded by built form. Wem is a sustainable settlement identified as a Key Centre and the site is well-located to provide sustainable development - including excellent connectivity for sustainable travel. Benefits of the site documented in the response. Site plan and site promotion material appended to response. Whilst the site is assessed within stage 2a of the site assessment, this is simplistic and fails to consider the potential for impacts and on-site mitigation.</p>	<p>1 and 2. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>1. The Housing and Employment Topic Paper provides information on past windfall rates and known potential windfall sites (whilst acknowledging that this constitutes only a portion of potential windfall sites in these locations).</p> <p>2. Shropshire Council considers that the proposed development strategy for Wem is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p>	No
A077	B001	Updated Housing and Employment Topic Paper.	General comments	Yes	Yes	<p>1. Support continuation of proposals to allocate site KCK009 at Knockin. Will shortly be commencing pre-application discussions to bring the site forward for development early in the plan period. All previous representations to the plan process remain relevant and wish to attend hearing sessions related to this site.</p>	1. Noted.	No
A078	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	Yes	<p>1. Support the draft Shropshire Local Plan and agree with most points listed in the draft response template for the community. Do not consider development outside the draft Shropshire Local Plan to be appropriate.</p>	11. Noted.	No

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A079	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Stage 2a Housing Appraisal Appendix 1 (regarding BRD030)	No	No	<p>1. Criteria 5 states BRD030 is within 480m of a Primary School. This relates to Castlefield's Primary, but whether accessed by foot or vehicle it is in excess of 1km and the school is already at capacity. The plus score of the Sustainability Appraisal (SA) is therefore incorrect.</p> <p>2. Criteria 7 states that the site is wholly or partly on grade 1, 2 or 3 agricultural land, which is true. But criteria 11 incorrectly states the site is wholly or partly brownfield/previous industrial/potentially contaminated land, which contradicts criteria 7.</p> <p>3. If the assessment was correct for these two criteria, the overall score would be "Poor" not "Fair". It is neither legally compliant nor sound for these assessments to be false or misleading.</p> <p>4. Concerned there is double counting of local need. Existing SAMDev allocations are sufficient to meet local needs, therefore any new homes on BRD030 would be surplus to local needs could be entirely regarded as a contribution towards the Black Country's unmet development needs. As such, the intention to allocate 1,050 new homes on site BRD030 would be disproportionate and in excess of what would be needed for either the local population or that of the Black Country.</p> <p>5. Appears no account is taken in the SA of the lack of access to main drains at BRD030 or that the current sewage treatment plant for the town (near Eardington) is already operating to capacity. Consider development of BRD030 would lead to untreated sewage discharges into the River Severn, contrary to Sustainability Objective 9.</p> <p>6. Consider affordable housing contributions for BRD030 (and other sites) to be unambitious. Proposals would have only a very limited impact in meeting the housing needs of local people. Suggest that a higher percentage of new dwellings built under the Local Plan should be required to be "affordable".</p>	<p>1-3. The Council considers that the Stage 2a assessment is proportionate and robust. It should be noted that measurements within the Stage 2a SA are 'as the crow flies' and previous industrial / potentially contaminated land is often found within agricultural fields.</p> <p>4. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p> <p>4 and 5. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.</p> <p>6. Shropshire Council also considers that the proposed affordable housing contributions are appropriate. They respond to the significant affordable housing need identified in Shropshire and best available information on development viability, from within the Shropshire Viability Study.</p>	No
A079	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Table 12.3 "Summary"	No	No	<p>1. It is stated that Bridgnorth benefits from strong road links to the Black Country via the A454, this is untrue and incorrect. These roads become severely congested at peak times where they reach the West Midlands conurbation and it is unrealistic for them to absorb extra traffic arising from further major housing development at Bridgnorth. Public transport links are limited and have dwindled over time to an hourly bus service. The assessment fails to mention existing allocations (BRID001/020a/020b at Tasley Gateway) for 500 dwellings, which have yet been begun. When these are eventually built, they are likely to add to existing traffic levels to/from the Black Country. Neither legally compliant nor sound to make these false or misleading assessments.</p>	<p>1. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.</p>	No
A080	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 4.14-4.21, 5.23-5.27 and 6.4-6.8 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. The draft Shropshire Local Plan helps protect Green Belt and the environment so important to Albrighton. It also ensures control over excessive housing and development, whilst addressing community facilities.</p> <p>2. The additional Sustainability Appraisal (paragraphs 12.1-12.3) confirms the Council has considered numerous sites for future housing development and identified the best locations to fulfil the need as being Tasley, Shrewsbury and the Former Ironbridge Power Station. As per paragraph 6.13 of the Green Belt Topic Paper, Albrighton is not the right place for the unmet Black Country housing needs, any proposals that are submitted should be rejected.</p> <p>3. Proposed allocations are identified to meet the needs of Albrighton, and no others are required - particularly in the Green Belt (which should not be developed as per paragraphs 6.4-6.8 of the Green Belt Topic Paper) or to accommodate contributions to the Black Country. This should only be reviewed after 2038. Employment should be directed to RAF Cosford or smaller buildings. Sites P36A and P36B are assessed within Appendix 3 of the additional SA and it was concluded they should not be development (they are not suitable for housing, in the Green Belt, would cause traffic issues, are near listed buildings, and would impact nature and local wildlife).</p>	<p>1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

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A081	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paras 12.1-12.3, Table 12.4 and Appendix 3 of the Sustainability Appraisal. Paras 7.63-7.64, 8.7-8.8 and 16.64-16.65, and Tables 8.1 and 8.3 of the Housing and Employment Topic Paper. Paras 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the Green Belt Topic Paper.	Yes	Yes	1. Support the draft Shropshire Local Plan as it clearly defines areas for current and future sustainable development in Albrighton. It is important that the Green Belt is protected for farming and the landscape/environment. 2. It is unfair that Albrighton should need to accommodate housing to meet the needs of the Black Country.	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A082	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153. 2. With the abandonment of HS2 (in part) this has resulted in a vast amount of already decimated land potentially being available for development, which is preferable to development on green field sites.	1 and 2. Noted, see response to A0153.	No
A083	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	All	Yes	Yes	1. No further comments to make at this stage. 2. Extol the growing role the canal network plays in promoting health and well-being and securing inclusive design for all users (including older people and those with disabilities) together with improving sustainable travel opportunities, heritage protection and biodiversity enhancement. Seek recognition of this role as the emerging Local Plan develops and in its forthcoming use in future planning management decisions affecting our network.	1 and 2. Noted. Draft policies within the draft Shropshire Local Plan address the historic environment and green infrastructure/open space.	No
A084	B001	General comment	General comments	Not Specified	Not Specified	1. References to Shropshire's AONB need to be amended to Shropshire's National Landscape. 2. Paragraph 4 of Draft Policy DP12 should include reference to "An Ecological Impact Assessment should be carried out at the appropriate time of year to accurately assess the impact on Priority Species." and the explanation should include reference to the BNG assessment taking place "in advance of any disturbance of priority species: i.e. if bats are to be disturbed then alternative habitat must be in place well in advance of (not after) any disturbance."	1 and 2. Noted. It is noted that AONB's are now to be referred to as National Landscapes. Although the legislative framework still refers to them as AONB's. No specific changes are proposed to the proposed policy framework for the conservation, enhancement of heritage assets or with regard to the National Landscape as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A085	B001	Updated Housing and Employment Topic Paper.	Paragraphs 8.7 and 8.8.	Yes	No	<p>1. Regulation 19 response objected to removal of land from the Green Belt and its proposed allocation (sites STC002 and P58a) as extensions to the employment site at Stanmore Industrial Estate. Nothing within the new material would cause the withdrawal/modification of this objection. If anything, it causes greater concern about the unnecessary and unjustified loss of Green Belt land at Stanmore. This proposal is not consistent with national policy, not effective (cannot be guaranteed to be delivered within the Plan period), and not justified (not based on appropriate robust evidence or consideration of alternatives). There has not been proper consideration of alternative sites or demonstration of exceptional circumstances and consider further land for employment is not needed at Stanmore:</p> <ul style="list-style-type: none"> - It was linked to previous proposals for housing in the area no longer carried forward, removing the need for them. -The existing site is not yet built-out and its development has slowed down (as have other sites in Bridgnorth including existing employment allocations); -There remains capacity at other employment locations in Bridgnorth; -It is no longer a centre of excellence for engineering and advanced manufacturing, the centre of excellence has relocated to Telford and Grainger and Warrall the main operator has halved their workforce and remain in difficulty. Occupiers are now similar to any other employment site in Shropshire (list of occupiers attached to response). -Sites P58a and STC002, should be deleted from Plan and the land should remain as Green Belt. <p>2. No explanation in the Housing and Employment Topic Paper as to why an extra 600 dwellings can be accommodated at BRD030, but there is no corresponding addition to the employment provision in that area. This is a 57% increase to housing without an equivalent increase to employment, though there is no lack of land. This would remove any need to extend Stanmore Industrial Estate, and thus no more Green Belt would be lost.</p>	<p>1. No specific changes are proposed to the allocations associated with Stanmore Industrial Estate as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p> <p>2. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>2. For the avoidance of doubt, proposals do not involve increasing the capacity of BRD030 by 600 dwellings, rather it is proposed that 600 of the dwellings that constitute the total capacity of the site (1,050) are identified to accommodate part of the proposed contribution to the unmet housing need forecast to arise in the Black Country.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A085	B002	Updated Green Belt Topic Paper.	Paragraphs 5.1 and 8.7-8.8.	Yes	No	<p>1. Regulation 19 response objected to removal of land from the Green Belt and its proposed allocation (sites STC002 and P58a) as extensions to the employment site at Stanmore Industrial Estate. Nothing within the new material would cause the withdrawal/modification of this objection. If anything, it causes greater concern about the unnecessary and unjustified loss of Green Belt land at Stanmore. This proposal is not consistent with national policy, not effective (cannot be guaranteed to be delivered within the Plan period), and not justified (not based on appropriate robust evidence or consideration of alternatives).</p> <p>2. Object to the Green Belt Topic Paper, as it does not adequately assess the possibility of alternatives to STC002 and P58a and the reasons given in paragraphs 8.24–8.26 do not constitute exceptional circumstances sufficient to over-ride the Policy intention to safeguard the Green Belt. When considering alternatives, no consideration has been given to other sites, so very difficult to be ascertain all possibilities for reasonable alternatives have been exhausted - difficult to believe that other sites of 11.5ha or less do not exist in the near vicinity of Bridgnorth. The “exceptional circumstances” are not “exceptional”, they are considerations for many businesses:</p> <ul style="list-style-type: none"> -No justification is provided as to why Stanmore is a key employment location for Bridgnorth and Shropshire; local knowledge indicates it is less important than considered by the Council and this is reducing. It is no longer a centre of excellence for engineering and advanced manufacturing (list of occupiers attached to response). -There is no evidence that high-occupancy rates are causing a problem for existing operators that wished to expand. Conversely a problem is that those in advanced engineering on the site are contracting. -Allowing expansion of existing firms is not an exceptional circumstance whatever the type of business concerned. -It is no longer a centre of excellence for engineering and advanced manufacturing. A number of car repair workshops now operate from the site but that does not mean that the site is a centre for engineering excellence. (list of occupiers attached to response). -No evidence is provided to support the claim that new advanced manufacturing enterprises are being turned away because of lack of available space on the site. -No exceptional circumstances linked to supporting the strategic role of Bridgnorth. -Aspirations of the Marches LEP, a local body formed to encourage business development, is not an “exceptional circumstance”. -The centre of excellence on the site has relocated to Telford. -The Council's intention for the site is to encourage “advanced engineering” operations to locate at Stanmore. No indication is provided of how these might be identified or attracted to Stanmore. -The flexibility allowance between identified employment land supply and requirement is 23%, well higher than other such allowances. -Sites P58a and STC002, should be deleted from Plan and the land should remain as Green Belt. 	<p>1-2. No specific changes are proposed to the allocations associated with Stanmore Industrial Estate as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p> <p>2. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. Where land is ultimately proposed for release from the Green Belt, exceptional circumstances and compensatory improvements to the remaining Green Belt are fully evidenced and justified within a Green Belt Exceptional Circumstances Statement.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A085	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Appendix 2	Yes	No	<p>1. Regulation 19 response objected to removal of land from the Green Belt and its proposed allocation (sites STC002 and P58a) as extensions to the employment site at Stanmore Industrial Estate. Nothing within the new material would cause the withdrawal/modification of this objection. If anything, it causes greater concern about the unnecessary and unjustified loss of Green Belt land at Stanmore. This proposal is not consistent with national policy, not effective (cannot be guaranteed to be delivered within the Plan period), and not justified (not based on appropriate robust evidence or consideration of alternatives).</p> <p>2. The Stage 2a site assessment (Appendix 2 of the additional Sustainability Appraisal SA) assesses P58 and STC002, both of which score minus points for access to a range of services/facilities. This assessment does not consider Green Belt and it is incorrect to suggest they are brownfield. The sites achieve a 'fair' status - it would seem sensible to discard sites only achieving 'fair' status, so better overall sustainability performance can be achieved. The sites should be deleted from the draft Shropshire Local Plan because they are unsustainably located in open countryside, away from services.</p>	<p>1-2. No specific changes are proposed to the allocations associated with Stanmore Industrial Estate as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p> <p>2. The Council considers that the Stage 2a assessment is proportionate and robust. It should be noted that previous industrial / potentially contaminated land is often found within agricultural fields.</p>	No
A086	B001	Updated Housing and Employment Topic Paper.	General comments.	Not Specified	No	<p>1. Consider the updated document show required changes will not fundamentally alter the submission plan, and are within the scope of Main Modifications which typically arise during any local plan examination.</p> <p>2. Inspectors have found assessment of local housing need sound, so no requirement to revisit it.</p> <p>3. The Council has undertaken additional Sustainability Appraisal (SA) relating to proposed contributions to the Black Country, which ensures procedural requirements are satisfied and substantiates the case for the 1,500 dwelling contribution. Agree considerations other than SA are relevant in reaching a planning judgement. Consider failing to contribute to the Black Country's needs could mean Shropshire's own needs are not met - knock on impact. Fully support the Council's approach to housing requirement, it is consistent with evidence of need, has been thoroughly assessed, and constitutes a positive approach to significantly boosting the supply of homes in the context of constraints elsewhere within the sub-region.</p> <p>4. Previous ambiguity in how the housing requirement has been arrived at resolved by the Topic Paper. Unequivocally demonstrates tests of soundness in national policy would be satisfied by resultant Main Modifications; objectively assessed needs of Shropshire will be met; and it is practical and sustainable to make a contribution to the Black Country. In addition to being positively prepared, resolution of ambiguity means the strategy is justified. Track record of previous completions in combination with cross-boundary working provides confidence the approach will be effective, and there is no conflict with national policy.</p> <p>5. Welcome proposed continuation of a 'high growth' component of the strategy to meet Shropshire's own needs.</p> <p>6. Support the housing requirement being a minimum, this provides clarity and is consistent with Government's intention to boost significantly the supply of homes.</p> <p>7. In a plan-led system would normally urge caution about reliance on windfall development to achieve changed assumptions to housing. However, acknowledge 55% of completions over a 10 year period have been on windfall sites, and in Shrewsbury and Whitchurch windfall allowances have already been exceeded. Would be irrational not to make an allowance for additional windfall to 2038 in these settlements, particularly when development in these locations accords with the 'urban focus' component of the strategy; and the scale of the uplift is modest. Support Option 1 which takes a more realistic approach to Shrewsbury and Whitchurch.</p> <p>8. Following assessment of all available sites, the Council identifies 3 sites to accommodate proposed contributions to the Black Country. The approach of</p>	<p>1-7 and 10-11. Noted.</p> <p>8. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.</p> <p>9. Shropshire Council considers that the assessment of housing land supply summarised within the Housing and Employment Topic paper is robust. A more detailed explanation of this assessment and the components of the identified housing land supply is provided within GC47: Five Year Housing Land Supply Assessment (2023 base date). The Council notes that during Local Plan examinations, determination of whether a 5 year housing land supply exists inevitably involve consideration of sites not proposed for allocation within the plan subject to examination, as a housing land supply invariably extends beyond such sites. This is not considered unique to Shropshire or indeed in any way unusual. The Council remain keen for the examination to consider the housing land supply identified in Shropshire.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						<p>specifying individual sites, which are no more or less likely than others in the vicinity to meet Black Country needs, appears rather contrived and of less relevance than the overall spatial distribution resulting from final selection of sites. In reality, decisions of where people choose to live is driven by a variety of factors including local connections, budget, commuting distance, local schools etc. Do not object to resultant overall distribution but to be sound this should be set out in a more rational manner.</p> <p>9. The draft Shropshire Local Plan was submitted for examination prior to publication of the current version of the National Planning Policy Framework (NPPF). Therefore assessment of housing land supply should be in accordance with previous versions - so a 5% buffer is required. This assessment will need to be pragmatic as the Council have not asked for the supply to be 'fixed' and 'saved' SAMDev Plan allocations are not before the examination. The Council identifies a deliverable/developable supply of 34,874 (including completions), which provides 10% flexibility. Have not undertaken analysis of the supply but at face value, agree the flexibility allowance is appropriate and the supply provides reasonable assurance the requirement can be satisfied/exceeded.</p> <p>10. No justification to change from an urban focus strategy.</p> <p>11. The Inspectors expectation that the total housing requirement should transparently combine 'high growth' for Shropshire with a contribution of 1,500 dwellings to the Black Country has been met, and is now properly evidenced.</p>		
A087	B001	Updated Housing and Employment Topic Paper.	Paragraph 8.3	Yes	No	<p>1. Support the Council's continued focus on a 'high growth' option seeking to achieve a 15% uplift on local housing need whilst also still making an allowance for meeting the unmet needs of the Black Country authorities.</p> <p>2. Object to Option 1 (increased settlement guidelines and windfall allowances) being a sound approach to accommodating the proposed uplift to the housing requirement. Whilst increasing the guideline for Whitchurch is supported, concerned with the reliance on windfall development and would note the Council see the benefit of identifying allocation to meet specific needs given the identification of sites to accommodate contributions to the Black Country. Consider Option 3 (additional allocations) should be pursued to provide greater certainty housing needs and the housing requirement will be met. If there is existing capacity within settlements, this should be identified as allocations.</p> <p>3. Promote Land off Prince William Close – Whitchurch as a proposed allocation. The land was not acquired until post submission of the draft Shropshire Local Plan, so it has not been substantially promoted through the plan making process; however it would represent 'rounding off' of the settlement and is available and deliverable within the plan period (it will also support delivery of necessary supporting infrastructure). The site was recently subject of a planning application (22/04957/FUL), which whilst withdrawn demonstrates the site is not subject to any technical constraints. It has capacity for around 70 dwellings at a density/layout which respects the site and its setting. Site plan and promotion material forms an appendix to this response.</p> <p>4. Would like to appear at the hearing sessions if the issue of additional allocations/expanding the settlement boundary of Whitchurch is to be discussed.</p>	<p>1 and 4. Noted.</p> <p>2 and 3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>3. Shropshire Council considers that the proposed development strategy for Whitchurch is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A088	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	No	No	<p>1. There is a lack of evidence to justify the proposed strategy for Bridgnorth means it is unsound. It should be reduced so no more than 1,000 dwellings are proposed between 2016 and 2036 and no sites allocated. Key issues:</p> <ul style="list-style-type: none"> -No local housing need assessment for the town or justification for levels of employment proposed. Growth figures are arbitrary (and for employment unclear) with no evidence they are sustainable or deliverable; how significant shortfalls from the previous plan period will be addressed; and why Bridgnorth is an attractive location to the employment market (given poor transport links and the conclusion in the Local Plan Viability Assessment that office and industrial development are unviable (and does not assess the viability of proposed employment allocations)). -Proposals influenced by Bridgnorth's location on a supposed strategic transport corridor, but this is not the case. The Shropshire Economic Growth Strategy does not consider Bridgnorth to be on such a corridor and the A454 is not referenced as a strategic route. -Proposals have not been informed by a highway assessment or consideration of capacity of public transport (which is problematic), given the Local Transport Plan was not available at submission. -No infrastructure plan - investment in infrastructure is essential to implement any plan. <p>2. True housing and employment land needs of the West Midlands remain unclear, this has not been accurately investigated or proved. Any contribution requires investment in the road network and public transport.</p> <p>3. The site assessment in the additional Sustainability Appraisal (SA) fails to recognise proposed allocations STC002 and P58a are in the Green Belt or separation (carbon impact) from proposed housing allocations. Proposed mitigation measures for loss of these Green Belt sites is also unrealistic.</p> <p>4. Challenge proposed exceptional circumstances for release of proposed allocations STC002 and P58a from the Green Belt:</p> <ul style="list-style-type: none"> -The strategy for Bridgnorth seeks to provide choice and competition in the market for employment, demonstrating alternative sites exist. -The site is not a centre of excellence for advanced engineering and manufacturing. For example the former MCMT building is no longer used by circular resources, but a domestic fuel/ped food supplier (not the relevant sector); and the square benefits from Planning Permission, but this has not been implemented. -Market forces impact on the ability for existing engineering companies on the site to expand (MCMT building is an example), undermining exceptional circumstances. <p>5. Given the demographics of the area, BRD030 represents an opportunity to increase provision of supported living accommodation. However, this increases need for associated key workers. It is also important to ensure associated infrastructure is provided.</p>	<p>1, 3 and 4. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p> <p>2. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>5. Noted. The draft policy recognises the links between provision of specialist housing and key worker accommodation/supporting infrastructure. Wider policies in the draft Shropshire Local Plan address affordable housing, an important mechanism in the context of local planning for supporting key workers.</p>	No
A089	B001	Updated Housing and Employment Topic Paper.	Paragraphs 16.64-16.65	Yes	Yes	<p>1. Pleased the draft Shropshire Local Plan recognises Albrighton's limited capacity for significant new development (paragraphs 16.64-16.65 of the Housing and Employment Topic Paper emphasises Albrighton's unique constraints and the necessity of preserving its Green Belt, which is critical to maintaining village identity) other constraints include conservation areas, the proximity to RAF Cosford, and the barriers created by the A41 and the railway line, which must be carefully considered when planning for the village. Recognise the need to meet demand for housing, but must avoid over-development and maintain Albrighton's identity.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A089	B002	Updated Green Belt Topic Paper.	Paragraphs 5.4, 5.23-5.27, 6.5-6.6, 6.12 and 7.1 and Table 4.1	Yes	Yes	<p>1. Shropshire Council has effectively responded to the Planning Inspector's requirement to provide evidence for the assessment and allocation of 1,500 dwellings needed for the unmet Black Country requirement, as outlined in Table 4.1. Pleased no additional Green Belt land has been designated for these dwellings.</p> <p>2. Support paragraph 5.4, no exceptional circumstances exist to justify removal of RAF Cosford from the Green Belt. Shropshire Council has clearly considered alternative locations for future housing needs and identified site allocations in Albrighton that safeguard existing Green Belt land.</p> <p>3. Strongly agree with paragraphs 5.23-5.27 and 6.5. Would prefer no land be removed from the Green Belt, but agree some safeguarded land, such as ALB017 and ALB021 in Albrighton, should be removed from the Green Belt for future development. This land should only be developed once allocated within a future Local Plan to meet Shropshire's housing needs.</p> <p>4. Endorse paragraph 6.6, no further land should be removed from the Green Belt in Albrighton. The three safeguarded areas identified provide for Albrighton's growth beyond the plan period. Speculative development on other Green Belt (which should be protected) at Albrighton is unacceptable.</p> <p>5. Paragraphs 6.12 and 7.1 highlight other locations are better suited than Albrighton to accommodate contributions to the Black Country. Any future speculative development in Albrighton for this purpose should be refused and the draft Shropshire Local Plan upheld, especially since the only other viable land has already been safeguarded.</p> <p>6. Careful consideration has been given to provide for sustainable future growth of Albrighton, whilst ensuring the Green Belt boundary remains unchanged at the end of the plan period. Green Belt must be protected (it controls urban sprawl, protects village boundaries, maintains green spaces, protects ecosystems, supports agriculture, and it safeguards historical and unique character of our rural community).</p>	1-6. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A090	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8 and 16.64-16.65, and Tables 8.1 and 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it protects the Green Belt at Albrighton, which is high-value farmland and helps promote biodiversity.</p> <p>2. Paragraphs 2.1-2.4, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal (SA) 4.14-4.21 of the Green Belt Topic Paper identify suitable sites to accommodate the proposed contribution to the Black Country. These satisfy the Black Country housing need without any incursion into the Shropshire Green Belt. Para 6.5-6.19 of the Green Belt Topic Paper refutes Albrighton as a sensible site for these Black Country needs.</p> <p>3. Support the concept of Green Belt and oppose development encroaching into it.</p>	1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

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A091	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	No	<p>1. Data on changes to the age of the Shropshire population between the 2011 and 2021 census point to the need to provide homes both for an ageing population but also to create the conditions and opportunity to attract younger families and the economically active.</p> <p>2. The aspirations of this development plan policy are laudable it is drafted in a manner that is both wordy and granular and may not capture the broader aspirations the policy seeks - supporting independent living/personal choice/cohesive communities. Larger hub settlements such as Highley are more likely to fulfil these objective in the context of Shropshire a large and otherwise sparsely populated county.</p> <p>3. Paragraphs 2-6 set out opportunities for accessible/adaptable housing. But all opportunities to support independent living are not captured, such as opportunities for down-sizing (in the community) or alternatively the provision of housing to meet the needs of extended families independently on the same site.</p>	<p>1-3. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. It forms part of the wider strategy to meet the housing needs of Shropshire.</p> <p>3. Draft Policy DP1 addresses housing mix, with the intention of ensuring smaller housing which could facilitate downsizing.</p>	No
A091	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments	Yes	No	<p>1. Cross Houses has been recognised as a Community Hub settlement for development. Allocation of site CSH006 would contribute to meeting Shropshire's housing needs and ensure the settlement benefits from a sufficient number of households to maintain the vitality of its services and facilities and secure the future of the settlement.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Cross Houses as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed development strategy for Cross Houses is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations) and proposed windfall allowances identified to contribute towards achieving each proposed development strategy).</p>	No
A091	B003	Updated Housing and Employment Topic Paper.	General comments	Yes	No	<p>1. In principle support the proposed housing requirement, because higher growth has the potential to deliver more economically beneficial outcomes which is particularly relevant to a county with a rising proportion of economically inactive residents.</p> <p>2. Consider the proposed approach to accommodating the proposed uplift to the housing requirement - increasing settlement guidelines/windfall allowances in three settlements (Shrewsbury, Whitchurch and Buildwas/Former Ironbridge Power Station) is inappropriate, as there is a finite/dwindling supply of windfall sites and recent changes like biodiversity net gain reduces potential. This approach therefore lacks certainty and is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). It also makes it difficult to determine if the needs of specific groups, such as those requiring affordable housing, specialist housing for those with disabilities and special needs, or self-builders is met, given they are reliant on percentage contributions on allocated sites, with windfall sites generally below relevant thresholds. It is considered this will be challenged in the context of Sustainability Appraisal, as it does not identify other locations and limits development. Given the above, it is considered evident that option 3, increasing site allocations, should be adopted to ensure that the Plan is justified, deliverable and effective.</p> <p>3. Paragraph 7.24 indicates the Council's view that there is a correlation between greater growth and greater economic and social benefits but also greater environmental impact. This is not always the case.</p> <p>4. Settlements such as Cross Houses should be given the opportunity to deliver appropriate housing and employment to meet needs, consistent with paragraph 7.28 of this document.</p>	<p>1. Noted.</p> <p>2 and 3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>4. No specific changes are proposed to the proposed strategy for Cross Houses as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed development strategy for Cross Houses is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations) and proposed windfall allowances identified to contribute towards achieving each proposed development strategy).</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A091	B004	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	No	<p>1. Assessment of 'reasonable' options to accommodate contributions to the Black Country is supported. However, it is considered the option of making no contribution should not be considered reasonable as it conflicts with the paragraph 11 of the National Planning Policy Framework. Aware that a shortfall remains/likely increasing in the Black Country. As such an uplift in Shropshire contribution would be a more reasonable consideration.</p> <p>2. BRD030; SHR060, SHR158 & SHR161; and IRN001 were allocations in the submission version of the draft Shropshire Local Plan, intended to meet the needs arising within the associated settlements and Shropshire as a whole, not the Black Country. To now identify them to accommodate contributions to the Black Country effectively reduces their contribution to addressing Shropshire's housing needs. Further housing land should therefore be allocated. There are unconstrained sites (such as ELL007) available in higher tier settlements (according with the spatial strategy) that would make appropriate contributions to meeting an uplift of the housing requirement and offset loss of capacity to accommodating Black Country contributions, whilst also meeting settlement specific housing requirements.</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p> <p>2. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.</p>	No
A091	B005	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	No	<p>1. Due to uncertainty about available land (brownfield land/windfall opportunities are taken-up and biodiversity net gain reduces potential), reliance on windfall allowances is not considered likely to result in a strongly positive effect on SA objective 3: provision of a sufficient amount of good quality housing. It is also difficult to ensure sufficient provision is made for specific groups, as provision is generally associated with larger sites. Consider increasing site allocations provides far more certainty as should be re-assessed accordingly.</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No
A091	B006	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	No	<p>1. Consider the proposed approach to accommodating the proposed uplift to the housing requirement - increasing settlement guidelines/windfall allowances in three settlements (Shrewsbury, Whitchurch and Buildwas/Former Ironbridge Power Station) is inappropriate, as there is a finite/dwindling supply of windfall sites and recent changes like biodiversity net gain reduces potential. This approach therefore lacks certainty and is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). It also makes it difficult to determine if the needs of specific groups, such as those requiring affordable housing, specialist housing for those with disabilities and special needs, or self-builders is met, given they are reliant on percentage contributions on allocated sites, with windfall sites generally below relevant thresholds. It is considered this will be challenged in the context of Sustainability Appraisal, as it does not identify other locations and limits development. Given the above, it is considered evident that option 3, increasing site allocations, should be adopted to ensure that the Plan is justified, deliverable and effective.</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A091	B007	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	No	<p>1. Data on changes to the age of the Shropshire population between the 2011 and 2021 census point to the need to provide homes both for an ageing population but also to create the conditions and opportunity to attract younger families and the economically active.</p> <p>2. The aspirations of this development plan policy are laudable it is drafted in a manner that is both wordy and granular and may not capture the broader aspirations the policy seeks - supporting independent living/personal choice/cohesive communities. Larger hub settlements such as Highley are more likely to fulfil these objective in the context of Shropshire a large and otherwise sparsely populated county.</p> <p>3. Paragraphs 2-6 set out opportunities for accessible/adaptable housing. But all opportunities to support independent living are not captured, such as opportunities for down-sizing (in the community) or alternatively the provision of housing to meet the needs of extended families independently on the same site. The benefits of looking at a rural communities wholistically to meet future needs is a relevant consideration in the contribution that CCT010 could bring within a short term time frame.</p>	<p>1-3. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. It forms part of the wider strategy to meet the housing needs of Shropshire.</p> <p>3. Draft Policy DP1 addresses housing mix, with the intention of ensuring smaller housing which could facilitate downsizing.</p>	No
A091	B008	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments	Yes	No	<p>1. Consider the removal of Cockshut's 'community hub' status will lead to the loss of services and facilities over time and reduce the village's long-term sustainability. In rural locations such as this, the measure of sustainability should be more loose than a strict points score. Shropshire Council previously recognised this in the adopted Development Plan. Consequently in terms of assessing site selection it is suggested that a less rigid approach could be applied to rural settlements.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Cockshutt as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed approach to identifying Community Hubs is appropriate and the development strategy for Cockshutt is appropriate, effective, sustainable, and deliverable.</p>	No
A091	B009	Updated Housing and Employment Topic Paper.	General comments	Yes	No	<p>1. In principle support the proposed housing requirement, because higher growth has the potential to deliver more economically beneficial outcomes which is particularly relevant to a county with a rising proportion of economically inactive residents.</p> <p>2. Consider the proposed approach to accommodating the proposed uplift to the housing requirement - increasing settlement guidelines/windfall allowances in three settlements (Shrewsbury, Whitchurch and Buildwas). It is considered this will be challenged in the context of Sustainability Appraisal, as it does not identify other locations and limits development.</p> <p>3. Paragraph 7.24 indicates the Council's view that there is a correlation between greater growth and greater economic and social benefits but also greater environmental impact. This is not always the case.</p> <p>4. Settlements such as Cockshutt should be given the opportunity to deliver appropriate housing and employment to meet needs, consistent with paragraph 7.28 of this document.</p>	<p>1. Noted.</p> <p>2 and 3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>4. No specific changes are proposed to the proposed strategy for Cockshutt as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed approach to identifying Community Hubs is appropriate and the development strategy for Cockshutt is appropriate, effective, sustainable, and deliverable.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A092	B001	Updated Housing and Employment Topic Paper.	Paragraphs 8.65-8.66	Yes	Yes	1. Consider all settlements identified for housing development in the draft Shropshire Local Plan should play a role in accommodating the proposed uplift to the housing requirement. As an example BIT022 in Bicton extends to 1.8 hectares and yet the housing guideline is only 15 dwellings. This site could accommodate more than double this amount of development and more land is available adjoining the site as a logical extension.	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement. 1. Shropshire Council considers that the proposed development strategy for Bicton is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.	No
A092	B002	Updated Housing and Employment Topic Paper.	Paragraph 9.10	Yes	Yes	1. Consider all settlements identified for housing development in the draft Shropshire Local Plan should play a role in accommodating the proposed uplift to the housing requirement. As an example BIT022 in Bicton extends to 1.8 hectares and yet the housing guideline is only 15 dwellings. This site could accommodate more than double this amount of development and more land is available adjoining the site as a logical extension.	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement. 1. Shropshire Council considers that the proposed development strategy for Bicton is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.	No
A093	B001	Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 16.11-16.43 and numerous others.	No	No	1. Object to the size and site of proposed allocation SHF018b&SHF018d. There is no evidence to justify this scale of site and consider larger companies are catered for at Telford. Majority of incoming residents commute to the West Midlands. Reference to past proposals for employment growth provided, supported by appendices.	1. Shropshire Council considers that the proposed development strategy for Shifnal is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.	No
A094	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Not Specified	Not Specified	1. No comments.	1. Noted.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A094	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments	No	No	<p>1. Section 6 has not tested all reasonable options for contributions to unmet housing need forecast to arise in the Black Country and so is not justified or sound. Consider insufficient justification (duty to cooperate met and agreement reached with the Black Country Authorities) is provided for not testing a higher contribution than 1,500 dwellings. Given likely changes to unmet need as a result on ongoing work in the Black Country, consider it is essential to test a higher figure, as there is a likelihood that unmet need apportioned to Shropshire may increase.</p> <p>2. Section 12 addresses sites to accommodate proposed contributions to the Black Country. Of these, the Former Ironbridge Power Station is the only one that adjoins the Black Country boundary and so is best located and should accommodate more than 600 dwellings of the proposed contribution. Therefore object to the proposed approach to accommodating contributions to the Black Country as it is not justified or sound.</p> <p>3. Support the role that the Former Ironbridge Power Station in accommodating uplift in the proposed housing requirement for the Shropshire Local Plan.</p> <p>4. A design code (appended to the response) has now been approved as part of Planning Permission 19/05560/OUT for the Former Ironbridge Power Station proposed allocation. This shows the potential for high density housing in the area adjacent to the employment area, along the railway line and overlooking the central green space; this evidences that the capacity of the site can increase to around 1,375 dwellings.</p>	<p>1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>2. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>2. For the avoidance of doubt, the Former Ironbridge Power Station is located within the reasonable assessment geography for sites to potentially accommodate contributions to the Black Country, but it does not adjoin the Black Country.</p> <p>3. Noted.</p> <p>4. Shropshire Council considers the proposed capacity of the Former Ironbridge Power Station is appropriate and aligns with the Planning Permission (19/05560/OUT) granted for development of the site.</p>	No
A094	B003	Updated Housing and Employment Topic Paper.	General comments	No	No	<p>1. Section 9 addresses the sites to accommodate proposed contributions to the Black Country and notes that the Former Ironbridge Power Station has the capacity to accommodate a significant volume of development. Support this assessment and consider evidence arising through the Development Management process demonstrates the site has a higher capacity than identified in the draft Shropshire Local Plan. However, consider the approach proposed is not adequately justified or sound as it is unclear why only 600 dwellings are allocated to the Former Ironbridge Power Station site, which is best located to accommodate contributions to the Black Country. Consider the full capacity of the site (1,375 dwellings) should be recognised. The site has capacity for an estimated 1,375 dwellings.</p> <p>2. Section 8 addresses the options to accommodate the proposed uplift to the housing requirement. Option 1 (Increasing Settlement Guidelines and Windfall) has been selected as the preferred means of accommodating the uplift in the planning requirement, including at the Former Ironbridge Power Station, and this is supported.</p> <p>3. Paragraph 8.92 addresses main modifications resulting for the approach to accommodating the proposed uplift to the housing requirement, including a 75 dwelling increase to the capacity of the Former Ironbridge Power Station. Whilst this is welcomed consider it should be increased by a further 300 dwellings to reflect the detailed understanding of the site constraints that has arisen through the Development Management process (without the need for additional land - informed by the design code prepared for the site which forms an appendix to this response).</p>	<p>1. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper. For the avoidance of doubt, the Former Ironbridge Power Station is located within the reasonable assessment geography for sites to potentially accommodate contributions to the Black Country, but it does not adjoin the Black Country.</p> <p>2. Noted.</p> <p>3. Shropshire Council considers the proposed capacity of the Former Ironbridge Power Station is appropriate and aligns with the Planning Permission (19/05560/OUT) granted for development of the site.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A094	B004	Updated Green Belt Topic Paper.	General comments	Not Specified	Not Specified	1. No comments.	1 Noted.	No
A095	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153. 2. The infrastructure of Shifnal, particularly roads, can not support any further development and it seems unjustified to take away more of Shifnal's Green Belt.	1. Noted, see response to A0153. 2. Shropshire Council considers that the proposed development strategy for Shifnal is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.	No
A096	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8 and 16.64-16.65, and Tables 8.1 and 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	1. Fully support the draft Shropshire Local Plan as it provides robust protection for the Green Belt around Albrighton; identifies locations for development of Albrighton - now and in the future; provides control over housing/employment planning decisions in Albrighton; and addresses community facilities/infrastructure needs. All new development should comply with this plan. 2. Paragraphs 6.4-6.8 of the Green Belt Topic Paper, Table 8.1 and paragraphs 8.7-8.8 of the Housing and Employment Topic paper and Table 12.4 of the additional Sustainability Appraisal (SA) identifies two proposed allocations for Albrighton. This is supported and no other sites should be developed for housing at the village (particularly in the Green Belt). 3. Support the three proposed areas of safeguarded land at Albrighton (paragraphs 5.24-5.27 and 6.5-6.8 of the Green Belt Topic Paper) which should not be developed until post 2038. 3. Appendix 3 of the additional SA concludes sites P36A and P36B should not be developed as they are not suitable should remain in the Green Belt; should be retained as farmland; and would create traffic issues/congestion. 4. Support conclusion of paragraphs 7.63-7.64 of the Housing and Employment Topic Paper that the housing requirement should increase by 500 dwellings, not opposed to new development in the right locations.	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A097	B001	Updated Green Belt Topic Paper.	Paragraphs 7.1-7.4 and 4.15-4.19	Yes	Yes	1. Endorse designation of Alveley as a Community Hub within the draft Shropshire Local Plan (paragraphs 7.1 & 7.2). 2. Proposed delivery of new houses (paragraph 7.3) can foster a more vibrant community. The measured growth outlined in draft Policy S3.2, demonstrates a commitment to balancing development needs with preservation of the valued Green Belt (paragraph 7.4). 3. Approach to accommodating contributions to the Black Country (paragraphs 4.15-4.19) seems well-considered. Identifying four sites (paragraph 4.17) ensures balanced development that meets community needs; is environmentally responsible and aligns with the overall spatial strategy (paragraph 4.18). It also importantly requires no new land to be released from the Green Belt.	1-3. Noted. No specific changes are proposed to the proposed strategy for Alveley as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A098	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8 and 16.64-16.65, and Tables 8.1 and 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan. It ensures control over housing and planning decisions in Albrighton; provides controlled, sustainable development that supports economic growth; protects agricultural land required for food production; and retains the village feel to 2038. Development should be in accordance with this plan.</p> <p>2. Object to new housing not being carbon positive.</p> <p>3. Sites to accommodate contributions to the Black Country in Tasley, Shrewsbury and the former Ironbridge Power Station are supported. Albrighton is not an appropriate location to accommodate a contribution to the Black Country (12.1-12.3 of the additional Sustainability Appraisal (SA) and 4.14-4.21 and 6.13 of the Green Belt Topic Paper).</p> <p>4. Table 12.4 of the additional SA; paragraphs 8.7-8.8, 16.64 and table 8.1 of the Housing and Employment Topic Paper; and paragraphs 5.24-5.27 and 6.5-6.8 of the Green Belt Topic Paper identifies the level of housing and site allocations to accommodate housing at Albrighton. These site allocations should be built steadily/phased over 10 years and then a period of less development to 2038. Support identification of 3 areas of safeguarded land, but this should not be developed until after 2038. New large employment development should be directed to RAF Cosford or smaller ad-hoc sites. No other housing development sites are required, particularly in the Green Belt.</p> <p>5. Sites P36A and P36B were assessed in Appendix 3 of the additional SA and it was concluded they should not be development. This is important as these sites are not suitable for housing; should remain in the Green Belt as agricultural land; there are already adequate sites for housing at the village; there are close to the consideration area; and would cause traffic issues.</p> <p>6. Support conclusion of paragraphs 7.63-7.64 of the Housing and Employment Topic Paper that the housing requirement should increase by 500 dwellings, not opposed to new development in the right locations. However, this should not be accommodated in the Green Belt.</p>	<p>1 and 3-6. Noted. No specific changes are proposed to the proposed strategy for Alveley as a result of the additional material that was the subject of this consultation.</p> <p>2. Noted. The draft Shropshire Local Plan includes draft policies which address the energy efficiency of development (SP3 and DP11). However, Government envisions that Building Regulations are the primary 'vehicle' for increasing such standards.</p>	No
A099	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	General comments	Yes	No	<p>1. Assessment of 'reasonable' options to accommodate contributions to the Black Country is supported. However, it is considered the option of making no contribution should not be considered reasonable as it conflicts with the paragraph 11 of the National Planning Policy Framework. Aware that a shortfall remains/likely increasing in the Black Country. As such an uplift in Shropshire contribution would be a more reasonable consideration.</p> <p>2. BRD030; SHR060, SHR158 & SHR161; and IRN001 were allocations in the submission version of the draft Shropshire Local Plan, intended to meet the needs arising within the associated settlements and Shropshire as a whole, not the Black Country. To now identify them to accommodate contributions to the Black Country effectively reduces their contribution to addressing Shropshire's housing needs. Further housing land should therefore be allocated. For example WEF028&WEF029 at West Felton a proposed Community Hub, these sites are well located and would meet the needs of West Felton and contribute to meeting the needs of Shropshire.</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p> <p>2. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p>	No
A099	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	General comments	Yes	No	<p>1. Due to uncertainty about available land (brownfield land/windfall opportunities are taken-up and biodiversity net gain reduces potential), reliance on windfall allowances is not considered appropriate - it lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). It is also difficult to ensure sufficient provision is made for specific groups, as provision is generally associated with larger sites. Consider increasing site allocations should be adopted to ensure that the Plan is justified, deliverable and effective.</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A099	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	General comments	Yes	No	1. Consider the proposed approach to accommodating the proposed uplift to the housing requirement - increasing settlement guidelines/windfall allowances in three settlements (Shrewsbury, Whitchurch and Buildwas/Former Ironbridge Power Station) is inappropriate, as there is a finite/dwindling supply of windfall sites and recent changes like biodiversity net gain reduces potential. This approach therefore lacks certainty and is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). It is considered this will be challenged in the context of Sustainability Appraisal, as it does not identify other locations and limits development. Given the above, it is considered evident that option 3, increasing site allocations, should be adopted to ensure that the Plan is justified, deliverable and effective.	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.	No
A100	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 2.4 & 6.4; 2.5 & 6.5; 12.1 - 12.3; Table 12.4 & Appendix 3; Updated Stage 3 Site Assessment of the Additional Sustainability Appraisal Paragraphs 7.63, 7.64, Tables 8.1 & 8.3, 8.7 - 8.8, 16.64 - 16.65 of the Updated Housing and Employment Topic Paper Paragraphs 4.14 - 4.21, 5.23 - 5.27, 6.4 - 6.8, 6.13 of the Updated Green Belt Topic Paper	Yes	Yes	1. Sensitive and appropriate planning for housing one of the reasons Albrighton has retained its village feel, sense of community and great quality of life. This approach is continued in the draft Shropshire Local Plan with options presented indicating ongoing control to ensure protection of the environment and greenbelt areas in Albrighton. 2. Whilst recognising need for sustainable economic growth and housing development Local Plan provides protection of irreplaceable greenbelt/rural areas and agriculture essential to achieving effective biodiversity and managing our environment for Albrighton and Shropshire as a whole and is supported on that basis. 3. Clear identification of allocated areas for current and future housing development in Albrighton provides certainty for residents, appropriate opportunities for prospective future residents and avoids unplanned overdevelopment. 4. The plan will ensure future Shropshire housing needs are met and balances the wider responsibilities of cooperation with other local authorities.	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A101	B001	Not stated	Not stated, developer Green Belt proposals specified	Yes	Yes	1. Object to building on Green Belt which needs to be protected. 2. Sufficient building designated for Albrighton to 2038 and insufficient facilities to cope with additional. 3. Sufficient affordable housing stock currently available in Albrighton. New builds will not be affordable local people.	1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A102	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1 – 12.3, 12.4 & Appendix 3 Updated Stage 3 Site Assessment. Paragraphs 7.63 / 7.64 - 8.77 / 8.78 Updated Housing and Employment Topic Paper. Paragraphs 6.4 – 6 Updated Green Belt Topic Paper.	Yes	Yes	<p>1. Albrighton provides an attractive residential environment with safe and easy (non car) access locally to outdoor recreation, schools, shopping, rail station and other facilities. Important that this aspect and Green Belt is protected and no overdevelopment.</p> <p>2. Albrighton has had fair level of development (Housing and Employment, 7.63 / 7.64) to date. The planned approach to 2038 ensures a methodical approach to meeting housing need taking into account infrastructure capacities, greenspace need etc. Proportionate, phased development on appropriate sites (not Greenbelt land), is a progressive and supported approach.</p> <p>3. Sufficient planned provision to meet Albrighton's housing needs (12.4, Appraisal Report) which provides proportionate development outside Greenbelt land.</p> <p>4. Identification of protected sites is supported. Use of Green Belt land in preference to brownfield & other less valuable land does not correlate with environmental and other priorities concerns. Significant impacts of loss of this land for future generations. Important to safeguard such land and to focus development on more appropriate sites.</p> <p>5. Appreciate local authority appraisal of best locations to accommodate additional housing across Shropshire (12.1 – 12.3, Appraisal Report). This should not be exceeded or located in Albrighton which unsuitable for mass overdevelopment/overpopulation.</p> <p>6. Conclusion of Appraisal Report (appendix 3) which identified that sites P36A and P36B should not be built upon needs to be emphasised in the Local Plan process in the light of opportunistic development proposals and ensure these sites are not released for development (Updated Greenbelt Topic Paper, 6.4 – 6.8). Significant impacts of development in this location which will result in overpopulation including – traffic, environmental quality and biodiversity issues & impacts on recreation, infrastructure and local independent businesses.</p>	1-6. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A103	B001	Updated Housing and Employment Topic Paper.	Paragraph 8.3 - Accommodate the Proposed Uplift to the Housing Requirement	Yes	No	<p>1. Support Whitchurch, as a principal centre, having its dwelling guideline increased by 75 dwellings, but question plan soundness if the settlement boundaries are not expanded and / or additional sites not allocated.</p> <p>2. Further consideration of expanding the allocations afforded Whitchurch and or suitably expanding the settlement boundaries to afford more scope for Windfall development is required.</p> <p>3. Land comprising 4.7 acres to the north of Alkington Road, Whitchurch is available, accessible, well related to the existing built form (& adjoins land promoted by Persimmon) with developer interest in the site. Confident that the site has potential to deliver early in the plan period & contribute to the housing numbers for the town has been specifically identified as a settlement catering for additional housing numbers. Location plan and details of the site are provided.</p> <p>4. Acknowledge updated housing requirement of additional 500 dwellings and support continuation of the high growth option seeking a 15% uplift on local housing need, whilst also still making an allowance for meeting the unmet needs of the Black Country authorities.</p> <p>5. Note that 4 Options are identified for delivering additional dwellings are identified and the Council concludes that Option 1 : Increasing settlement guidelines and windfall allowances is preferred with 3 locations only: Shrewsbury, Ironbridge strategic settlement and Whitchurch identified to accommodate the dwellings. Given the preferred approach and constrained development boundary around Whitchurch, question scope to achieve the windfall numbers targeted for Whitchurch without expanding the settlement boundary of Whitchurch or increasing the allocated sites.</p> <p>6. Inclusion of the site would align with Option 3: where the Council acknowledges that there may be opportunities to extend proposed allocations and the identified site could be included as an additional allocation or considered an expansion of the land to the east being promoted by Persimmon Homes. It would also reflect the specific allocation approach identified as appropriate by the Council in meeting needs arising outside Shropshire (those of the Black country).</p>	1-6. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.	No
A104	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1 - 12.3, 12.4 & Appendix 3; Updated Stage 3 Site Assessment of the Additional Sustainability Appraisal Paragraphs 7.63, 7.64, Tables 8.1 & 8.3, 8.7 - 8.8, 16.64 - 16.65 of the Updated Housing and Employment Topic Paper Paragraphs 4.14 - 4.21, 5.23 – 5.27, 6.4 – 6.8, 6.13 of the Updated Green Belt Topic Paper	Yes	Yes	<p>1. The Local Plan supports the protection of the attractive rural village of Albrighton and its greenbelt. Shropshire Council have considered the need for housing and reviewed the sites available in Shropshire (12.1-12.3) with 2 sites in Albrighton identified (12.4) No other sites should be made available and Green Belt land and environment protected thus addressing housing need in a controlled way without turning the village into a town. Other sites proposed by developers in Green Belt should be rejected.</p> <p>2. Additional Sustainability Appraisal report Appendix 3. Updated stage 3 site assessment - does not support development of P36A and P36B which should be retained as Green Belt land for current & future benefit. There are other sites more suitable for housing without environmental impact and destroying green belt.</p> <p>3. Shropshire Local Plan – Housing and Employment Topic Paper (7.63 and 7.64) - agree a need for extra housing but only that which is well planned, environmentally compatible and outside green belt. Identified sites ALB017 and ALB021 need to be steadily built to minimise impact on the village.</p> <p>4. Green Belt should not be built on to meet Black Country housing needs, other options available.</p> <p>5. Any large buildings for employment should not be within the village.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A105	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Not stated	No	No	<p>1. These representations follow the submission of representations at Regulation 19 & to Hearing Matters 2, 3 and 4 (June 2022) as in respect of land north of Wolverhampton Road, Shifnal.</p> <p>2. Both topic papers refer to the proposed housing requirement between 2016 and 2038. However, Paragraph 22 of the NPPF sets out that 'strategic policies should look ahead over a minimum 15 year period from adoption....' The plan period is therefore now outdated with less than the minimum requirement of 15 years from the date of adoption and would fail to plan for the long-term need for new homes in Shropshire. The plan period should also be extended to at least 2041 assuming plan adoption 2025.</p> <p>3. As the plan period is less than the required 15 years and no agreement has been made with the planning inspector for an extension, it is considered the identified housing requirement is out-of-date. A revised calculation is required to address changing housing delivery context across the West Midlands, including collapse of the Black Country Core Strategy in October 2022 and the identified housing shortfall since the submission of the local plan for examination.</p> <p>4. The submitted plan also exceeds the two year period since submission to the Secretary of State. The Planning Practice Guidance states that local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination and kept under review and revised where appropriate (Paragraph 008 Reference ID 2a-008-20190220).</p> <p>5. Welcome continuation of the high growth option but the Council has failed to demonstrate how a contribution of 1,500 dwellings to meet the Black Country shortfall is appropriate or justified. Noting requirements of NPPF paragraph 11 reference providing for housing needs & other uses 'as well as any needs that cannot be met within neighbouring areas.' There is no explicit evidence (including absence of any detailed analysis into the functional economic relationship between Shropshire and the Black Country) to robustly demonstrate whether the proposed uplift is sufficient to address recognised Black Country needs.</p> <p>6. The Council has not assessed and tested the potential of contributing a higher quantum of dwellings to help meet the Black Country's unmet housing need.</p> <p>7. Evidence of shortfall from The Black Country Urban Capacity Review (December 2019) coupled with uplifts of 35% to Wolverhampton's local housing need as a result of the Government's response to 'Changes to the current planning system' consultation in August 2020 will exacerbate unmet need. Whilst PPG expectation is for Wolverhampton, and thus the Black Country, to meet the uplift themselves, the PPG confirms this is only expected "unless it would conflict with national policy." Given the level of Black Country housing shortfall of 26,920 dwellings to 2038 and constrained nature of the conurbation, exceptional circumstances for a Green Belt review identified to meet need. However, given under-bounded and constrained nature of Wolverhampton and Sandwell, it is inevitable that the Black Country will be unable to provide for its own housing needs, as required by NPPF paragraph 11(b). Therefore, an increased contribution by the Shropshire Draft Local Plan would be appropriate.</p> <p>8. Strongly object to the Council's proposed contribution of 1,500 dwellings to the Black Country unmet housing need, as opposed to a significantly larger contribution of 3,000 dwellings as suggested by ABCA. Expectation in paragraph 35c NPPF that Local Plans should be 'based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred....' Whilst the Council has recognised its functional relationship with the Black Country and there has been positive dialogue during Plan preparation, the Black Country Authorities (in their Reg 19 rep (A0148)) highlighted constraints within other local authority areas to helping to meet need and indicated that a the allocation of land at M54 junction 3 for employment-led mixed use development supported by 3000 dwellings would be an appropriate location & quantum of</p>	<p>1. Noted</p> <p>2 & 3. Shropshire Council considers the proposed plan period addressed within the draft Shropshire Local Plan is appropriate. Importantly:</p> <ul style="list-style-type: none"> - There is nothing in law requiring a Local Plan to have a minimum 15 year period from adoption. - The National Planning Policy Framework (NPPF) preference for a minimum 15 year period from adoption (paragraph 22) is not a mandatory requirement and shorter timescales can be sound, as established in other Local Plan examinations. The Council considers the primary intention of this preference is to ensure plans are forward-thinking; provide a long-term vision, strategy and basis for sound decision making; and do not unduly restrict growth. This is the case in the draft Shropshire Local Plan, with a spatial strategy underpinned by the principle of 'high-growth'. - The National Planning Practice Guidance (NPPG) on Plan Making addresses the plan period at paragraph 64, indicating that the focus is on ensuring that policies are 'forward thinking' and look over a minimum 15 year period. Again, this is the case in the draft Shropshire Local Plan which addresses a 22 year period and has since submission formed a material consideration in decision making. - The proposed plan period continues to align with that of the latter Regulation 18 and Regulation 19 consultations and crucially the submission version of the draft Shropshire Local Plan. - The proposed plan period aligns with the timescales for the proposed vision, objectives, policy framework and settlement strategies within the submission version of the draft Shropshire Local Plan. - The proposed plan period supports the continuation of the spatial strategy proposed within the submission version of the draft Shropshire Local Plan - consistent with the proposed retention of the 1,500 dwelling contribution towards the unmet housing need forecast to arise in the Black Country and the continuation of the 'high-growth' principle that underpins the spatial strategy. - This approach is a pragmatic response to the numerous factors that have had implications for the timescales of the plan making process and meant that adoption of the draft Shropshire Local Plan has not occurred when envisaged by the Council - which would have allowed for more than 15 years remaining within the plan period at adoption. In particular: <ul style="list-style-type: none"> > The Covid 19 pandemic which due to necessary measures to safeguard communities had led to direct delays at key stages in the plan making process; had significant implications on Council resources in order to support the response to the Covid 19 pandemic, leading to delays to the plan making process; and resulted in a specific extension to the timescales for the Regulation 19 consultation. > A number of lengthy and complex objections which required due consideration through the Regulation 19 consultation process and during the ongoing examination processes. This includes a Pre-Action Protocol letter which had a specific implication for the timescales of the examination. - This approach is also a pragmatic approach to avoiding the 'cycle' of examination timescales leading to extensions to plan periods, leading to extension of examination timescales. - This approach is also a pragmatic approach to seeking to positively progress the examination and adoption of the draft Shropshire Local Plan in order to facilitate implementation of the sustainable spatial strategy underpinned by the principle of 'high-growth'. - This approach positively responds to the requirement to review Local 	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						<p>housing. Support for this provision is reiterated by ABCA is later correspondence. In the absence of a statement of common ground confirming any of the BCA's agreement to this quantum of contribution, the Council risks its plan being considered unsound by failing to satisfy NPPF paragraph 35c.</p> <p>9. Latest evidence from Issues and Preferred Options Consultation (Regulation 18) in February 2024 on the Wolverhampton Local Plan identified significant and higher level of unmet need for 11,998 homes over the Plan period and a need to export remaining housing need to neighbouring authorities" (Para 5.17 – Option H3). Reasonable that Shropshire should be expected to help deliver more housing to address this now larger unmet need through the Duty to Cooperate in accordance with NPPF Paras 11b and 35c.</p> <p>10. Despite the Black Country Plan Review [BCPR] no longer proceeding, the acute unmet housing need remains and will still need to be addressed and each of the BCA authorities still requires assistance separately. The Shropshire Local Plan Inspectors have acknowledged continuing identified unmet need as an important strategic matter in their interim findings.</p> <p>11. Unmet need has increased across the West Midlands and the updated topic papers do not reference addressing Birmingham's needs. A review of the BCA's separate emerging LPRs suggests that the authorities' supplies have reduced, & that the previous stated supply and unmet housing need conclusions of 28,000 has increased to about 37,000 dwellings. In addition Birmingham City Council's latest Issues and Options consultation also identified an emerging c.78,000 dwelling unmet need between 2022 and 2042 (Para 5.13). There is therefore a need to review the housing requirement to consider all of the surrounding authorities unmet needs which, even if there is release of Green Belt, are likely to remain severe and acute. Thus whilst it is accepted that the NPPF requires LPAs who are subject to the 35% urban centres uplift to accommodate their needs within their own area where possible (Para 62), it is still critical that the Council makes appropriate assistance in addressing this unmet housing need now, as these needs are acute and unlikely to be met in full by the surrounding authorities without conflicting with the wider policies in the NPPF (Para 62).</p> <p>12. The level of delivery for the Black Country's unmet needs is not considered to be sufficiently tested as such, Shropshire Council should provide a significantly higher delivery towards the Black Country's unmet housing needs.</p> <p>13. Shropshire Council should look to make an appropriate higher contribution to addressing need by delivering and maximising on the level of housing growth within the authority by densifying a wide range of proposed site allocations. Also additionally suitable & available non Green Belt safeguarded land with potential for early delivery at 'Land between Revells Rough, Lamedge Lane and the eastern rail line' in Shifnal (identified in Schedule S15.1(iii) of the draft Local Plan) should be allocated for housing in order to further contribute to surrounding authorities unmet housing need.</p>	<p>Plans every five years.</p> <p>Examples of other circumstances where such an approach has been employed include:</p> <ul style="list-style-type: none"> -The Hart Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraph 32 of their report (published on 10th February 2020), stating: "There has been some suggestion that the Plan period should be extended. The Plan looks forward 13 years after anticipated adoption, which is below the preferred 15 year time period set out in Paragraph 157 of the NPPF. However, the NPPF's preference is not a set requirement and I consider 13 years to be an appropriate time scale in this instance, particularly as there is now a requirement to review plans every five years." Although the NPPF has been revised since the report, Shropshire Council is of the view that the wording relating to the 15 year time period remain largely unchanged. -The Worthing Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraphs 74-76 of their report (published on 14th October 2022), stating "Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption. As submitted, the Plan period runs from 2020 to 2036. It was anticipated that the Plan would be adopted in 2021 and thus would have met this requirement. The Plan has been prepared during the COVID-19 pandemic, which has had understandable consequences in terms of the preparation and submission of the Plan. This means that the Plan will now be adopted in 2022 and will thus have a lifespan of around 14 years. Although the period will now fall marginally short of the 15 years recommended by the NPPF, I conclude that this does not render it unsound. Delaying the adoption of the plan to address any implications for extending the period would be more likely to frustrate, rather than accelerate the delivery of new housing and employment in Worthing. This would be contrary to the Government's objective of significantly boosting the supply of housing and for Councils to have up-to-date plans in place. On balance, a plan period of up to 2036 would remain broadly consistent with the aims of paragraph 22 of the NPPF in allowing adequate time for the Plan's strategic policies to take effect." 4. It is acknowledged that the Draft Shropshire Local Plan was submitted to the Secretary of State in September 2021, and as such the two year period that planning practice guidance stipulates it can be relied upon without the need to consider a review has elapsed. However, within ID28 and ID36 the Inspectors have concluded that the Council's approach to identifying housing needs is sound. Furthermore, within ID36 the Inspectors specified that "... even when housing need figures based on LHN become more than 2 years old during an examination there would have to be particular circumstances to require a review. This is because updating housing need figures during an examination can result in a great deal of consequential changes which have the potential to significantly delay the examination and the plan being found sound. We are not currently aware that these circumstances exist here." Notably, within ID36 and ID37 the Inspectors specified that the baseline for the additional Sustainability Appraisal of housing requirement options should be the 2020 assessment of Local Housing Need. It is therefore not considered necessary or appropriate for the Council to utilise an alternative calculation of Local Housing Need to underpin the housing requirement. <p>5-13. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs</p>	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
							were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs. 13. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.	
A106	B001	Updated Housing and Employment Topic Paper.	Paragraphs 12.112.3, 12.4	Yes	Yes	1. Long term resident. Valued , beautiful surroundings. Important to protect precious farmland for the future	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A106	B002	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.24-5.27, 6.4-6.8 and 6.13.	Yes	Yes	1. Green Belt countryside access important, as a child provided valuable and safe recreation and enjoyment of wildlife.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A107	B001	Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8 and 6.13.	Yes	Yes	1. Long term resident highlighting community that exists. Development other than gradual infill would ruin character of settlement and change to dormitory settlement(paras 6.4-6.8). Any Black Country development required should be in a more suitable and sustainable location.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A108	B001	Updated Green Belt Topic Paper.	Paragraphs 7.63 - 7.64 and 8.7 & 8.8	Yes	Yes	1. Green belt should be protected from development. Albrighton community special & high importance (physical & mental health benefits) of Albrighton Green Belt for local community and people beyond who enjoy recreation within it. Ref para 8.7. Impact would be widespread if Albrighton grew beyond that identified in the Local plan. 2. Ref para 7.63 – 7.64 Agree sufficient growth to meet local needs. Anything beyond that identified should be rejected.	1-2 . Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A109	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.24-5.27.	Yes	Yes	1. Support the Local Plan because believes the Council have given careful consideration to Green Belt which is important for people, wildlife & food production.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A110	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	Paragraphs 12.1 - 12.3 & 12.4 Updated Sustainability Appraisal Report. Paragraphs 9.7c (8), 8.7-8.8, 16.15 Updated Housing and Employment Topic Paper	Yes	Yes	1. ALB017 and ALB021 provides for sufficient expansion of Albrighton. 2. The local plan provides a sensible approach to regulate the expansion of Albrighton village. 3. Flooding and Highway congestion and pollution would be exacerbated by any further development.	1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A111	B001	Updated Housing and Employment Topic Paper.	Tables 8.3 and 8.1 Updated Housing and Employment Topic Paper	Yes	Yes	1. Recent house building in Albrighton has put pressure on the medical practice, schools and infrastructure. 2. As per table 8.3 of Updated Housing and Employment Topic Paper ALB017 and ALB021 should be built steadily over a 10 year period. 3. There should be less house building at the end of the period up to 2028. 4. The medical practice has obtained planning permission to accommodate the expanded patient population.	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A112	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 4.14-4.24, 12.1-12.3, 12.4	Yes	Yes	1. Agree with development at ALB017 however no other sites should be made available in the local plan. 2. The Black Country need should be provided in Tasley BRD030, Shrewsbury SHR060, SHR158 & SHR16 and former Ironbridge Power Station. 3. The Green Belt land adjacent to Albrighton should be maintained.	1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A113	B001	Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 7.63-7.64 & 8.1 8.7-8.8 Paragraphs 5.24-5.27	Yes	Yes	1. Support the local plan development as it will retain Albrighton's character.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A114	B001	Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8	Yes	Yes	1. Support the Shropshire Local Plan. 2. Concerned about the loss of greenbelt in this area.	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A115	B001	Not stated	Paragraphs 6.4-6.8	Yes	Yes	1. Support the Shropshire Local Plan.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A116	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	Paragraphs 6.1-6.14, 6.1.7 and 7.1.4 and Tables 6.1, 7.1, 8.1, 9.1 and 12.1-12.3 of the Additional Sustainability Appraisal. Paragraphs 7.63-7.64 and 8.7-8.8 and Tables 8.1 and 8.3 if the Housing and Employment Topic Paper. General comments on the Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	Yes	Yes	1. Support the draft Shropshire Local Plan as it structured and seeks to deliver measured sustainable development. It is responsive to the character, heritage and infrastructure of Albrighton. It protects the environment, green spaces and Green Belt which are so important for health and wellbeing of residents now and in the future, support biodiversity and constitutes high-quality agricultural land essential for food production. It acknowledges the community and demographic needs and provides for hopefully high-quality housing incorporating green technologies on defined allocated areas and identifies three areas of safeguarded land for future development. 2. Consider large scale rapid development (housing and supermarkets) particularly in the Green Belt is opportunistic and would have a detrimental impact on the natural environment; result in loss of farmland essential for food protection; have a negative visual impact; negatively impact on infrastructure and cause flood risk, pollution and carbon dioxide emissions; negatively affect the village centre, local services and businesses in the area; and negatively affect the local community. This should not be supported. Brownfield sites should be exhausted before Grey/Green Belt. 3. Want to see sustained and measured development that is net zero and encourages less vehicles/village life. 4. Sites identified at Tasley, Shrewsbury and Ironbridge offer brownfield land for development. 5. Draft Policy SP1 of the draft Shropshire Local Plan - looks at local sustainability and habitats regulations assessment keep citizens in mind.	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A117	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General Comments	Not Specified	Not Specified	1. The additional Sustainability Appraisal work undertaken specifically focuses on the proposed Plan contribution toward any Black Country unmet need within Shropshire based on the three options for growth previously considered, and the potential environmental impacts of delivering a 1,500 dwelling contribution toward that unmet need. 2. This approach is supported, it addresses the Inspectors' requirements to consider the potential environmental impacts and ensures all relevant options and distribution of housing land with and without a contribution to the Black Country's unmet need, have been set out at paragraphs 4.1 and 6.8 of the additional Sustainability Appraisal work. 3. The additional Sustainability Appraisal work is considered appropriate to provide robust evidence that informs the Local Plan Strategy.	1-3. Noted.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A117	B002	Updated Housing and Employment Topic Paper	General Comments	Not Specified	Not Specified	<p>1. Page 56 onward of the Topic Paper considers potential windfall sites or opportunities that would arise in the identified settlements, and also considered past windfall delivery. This work is supported and provides evidence supporting the Council's preferred option.</p> <p>2. Main Modifications to the Plan would be required to include the amended housing requirements and the distribution of development with additional windfall allowances in settlements (draft policies SP2, S.16 and S20). Reserve the right to comment on specific wording, however in principle these modifications would be sound based on the evidence base which informs the identified amendments.</p> <p>3. Barwood Land's interests on land west of Ellesmere Road could ensure that the Local Plan delivers housing from early in the plan period. Proposed allocation SHR173 for up to 450 dwellings plus a local centre and strategic infrastructure is subject to a outline planning application currently before the Local Planning Authority (22/01432/OUT).</p> <p>4. The Councils proposed trajectory identifies the site could deliver 190 dwellings by (2033) with the remainder delivered post 2033 once the North West Relief Road is delivered. This position is generally supported and based upon the current planning application and issue of a positive decision it is considered the site could begin delivery by 2026 to ensure the deliver of housing as early as possible to meet the Local Plan Strategy and sustainable development.</p> <p>5. Subject to further highway modelling we believe that the entire site, not just phase 1, could be delivered in full prior to the North West Relief Road being fully operational.</p>	1-5. Noted.	No
A118	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper	Paragraphs 4.14-4.21, 6.4-6.8 and 8.7-8.8 Green Belt Topic Paper. Paragraphs 7.63 and 7.64 Updated Housing and Employment Topic Paper. Paragraphs 12.1-12.3 and 12.4 Updated additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Yes	Yes	<p>1. The Local Plan will provide the additional housing that is needed without destroying the identity of Albrighton.</p> <p>2. Support the Local Plan which seems to meet all the challenges Shropshire faces both now and in future years.</p>	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A119	B001	Updated Housing and Employment Topic Paper.	General comments	No	No	<p>1. The Plan period and its housing and employment need calculations are not consistent with paragraph 22 of the National Planning Policy Framework (NPPF), which sets a minimum period of 15 years from date of adoption. given adoption is not expected until 2025 (by the Inspectors within ID39) the plan period would have 13 years remaining, which is too short. As such, consider the plan period should be extended by 2 years to 2040. This equates to an additional 2,710 dwellings and 26ha based on the Council's proposed approach in GC45 (but excluding the 1,500 dwelling / 30ha contributions to the Black Country which are fixed amounts), although consider the requirement to 2038 and for the additional period should be higher (see objection A119 B002).</p>	<p>1. Shropshire Council considers the proposed plan period addressed within the draft Shropshire Local Plan is appropriate. Importantly:</p> <ul style="list-style-type: none"> -There is nothing in law requiring a Local Plan to have a minimum 15 year period from adoption. -The National Planning Policy Framework (NPPF) preference for a minimum 15 year period from adoption (paragraph 22) is not a mandatory requirement and shorter timescales can be sound, as established in other Local Plan examinations. The Council considers the primary intention of this preference is to ensure plans are forward-thinking; provide a long-term vision, strategy and basis for sound decision making; and do not unduly restrict growth. This is the case in the draft Shropshire Local Plan, with a spatial strategy underpinned by the principle of 'high-growth'. -The National Planning Practice Guidance (NPPG) on Plan Making addresses the plan period at paragraph 64, indicating that the focus is on ensuring that policies are 'forward thinking' and look over a minimum 15 year period. Again, this is the case in the draft Shropshire Local Plan which addresses a 22 year period and has since submission formed a material consideration in decision making. -The proposed plan period continues to align with that of the latter Regulation 18 and Regulation 19 consultations and crucially the submission version of the draft Shropshire Local Plan. -The proposed plan period aligns with the timescales for the proposed vision, objectives, policy framework and settlement strategies within the submission version of the draft Shropshire Local Plan. -The proposed plan period supports the continuation of the spatial strategy proposed within the submission version of the draft Shropshire Local Plan - consistent with the proposed retention of the 1,500 dwelling contribution towards the unmet housing need forecast to arise in the Black Country and the continuation of the 'high-growth' principle that underpins the spatial strategy. -This approach is a pragmatic response to the numerous factors that have had implications for the timescales of the plan making process and meant that adoption of the draft Shropshire Local Plan has not occurred when envisaged by the Council - which would have allowed for more than 15 years remaining within the plan period at adoption. In particular: <ul style="list-style-type: none"> >The Covid 19 pandemic which due to necessary measures to safeguard communities had led to direct delays at key stages in the plan making process; had significant implications on Council resources in order to support the response to the Covid 19 pandemic, leading to delays to the plan making process; and resulted in a specific extension to the timescales for the Regulation 19 consultation. >A number of lengthy and complex objections which required due consideration through the Regulation 19 consultation process and during the ongoing examination processes. This includes a Pre-Action Protocol letter which had a specific implication for the timescales of the examination. -This approach is also a pragmatic approach to avoiding the 'cycle' of examination timescales leading to extensions to plan periods, leading to extension of examination timescales. -This approach is also a pragmatic approach to seeking to positively progress the examination and adoption of the draft Shropshire Local Plan in order to facilitate implementation of the sustainable spatial strategy underpinned by the principle of 'high-growth'. -This approach positively responds to the requirement to review Local Plans every five years. 	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
							<p>Examples of other circumstances where such an approach has been employed include:</p> <ul style="list-style-type: none"> -The Hart Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraph 32 of their report (published on 10th February 2020), stating: "There has been some suggestion that the Plan period should be extended. The Plan looks forward 13 years after anticipated adoption, which is below the preferred 15 year time period set out in Paragraph 157 of the NPPF. However, the NPPF's preference is not a set requirement and I consider 13 years to be an appropriate time scale in this instance, particularly as there is now a requirement to review plans every five years." Although the NPPF has been revised since the report, Shropshire Council is of the view that the wording relating to the 15 year time period remain largely unchanged. -The Worthing Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraphs 74-76 of their report (published on 14th October 2022), stating "Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption. As submitted, the Plan period runs from 2020 to 2036. It was anticipated that the Plan would be adopted in 2021 and thus would have met this requirement. The Plan has been prepared during the COVID-19 pandemic, which has had understandable consequences in terms of the preparation and submission of the Plan. This means that the Plan will now be adopted in 2022 and will thus have a lifespan of around 14 years. Although the period will now fall marginally short of the 15 years recommended by the NPPF, I conclude that this does not render it unsound. Delaying the adoption of the plan to address any implications for extending the period would be more likely to frustrate, rather than accelerate the delivery of new housing and employment in Worthing. This would be contrary to the Government's objective of significantly boosting the supply of housing and for Councils to have up-to-date plans in place. On balance, a plan period of up to 2036 would remain broadly consistent with the aims of paragraph 22 of the NPPF in allowing adequate time for the Plan's strategic policies to take effect." 	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A119	B002	Updated Housing and Employment Topic Paper.	General comments	No	No	<p>1. The re-assessment of housing and employment land requirements is not legally compliant, positively prepared, justified, effective, or consistent with national policy.</p> <p>-There is no basis for the Council to recast the objectively assessed requirements for either housing or employment as they have not been found unsound and the Inspectors have made no request for either the Shropshire need or the Shropshire growth factor to be re-assessed for housing or employment in order to address an issue of soundness / relevant modifications to make the Plan sound. Examples provided from ID28 and ID36.</p> <p>-ID36 was clear that the defined task for the Council to address soundness was in essence to update the SA to add the agreed provision for the Black Country to the Shropshire requirement (need and Shropshire growth factor). Even if there is a reason to re-assess them to take account of up-to-date circumstances, this does not affect the matter of legal compliance - in the absence of the Inspectors requesting the Council to re-assess the needs for Shropshire and growth for Shropshire, there is no ability for the Council to propose such changes to the Plan once submitted (see s20(7C) of the Planning and Compulsory Purchase Act 2004 and Planning Inspectors Examination Procedure Guide).</p> <p>-The Housing and Employment Topic Paper reduces the housing and employment land requirements for Shropshire (need and Shropshire growth factor) for 30,800 dwellings to 29,800 dwellings and 300ha to 290ha respectively. There is no valid justification or legal mechanism to support either of those changes.</p> <p>-The Council rely on interpretation of paragraph 2 of ID36 (which is based on ID28) as the basis to recast housing and employment needs for Shropshire, as the Inspectors confirm they have not found the housing and employment land requirements for Shropshire sound. This continues the confusion of conflation of need and requirement, the Inspectors are actually saying they have not found the overall housing and employment land requirements for Shropshire sound (need plus Shropshire growth factors plus agreed contribution to the Black Country). In ID28 the Inspectors require contributions to the Black Country to be added to the 30,800 and 300ha housing and employment land requirements (calculated from need plus the Shropshire growth factor - see paras 11, 13, 17, 19 and 22. Para 11 specifies it is the attempt to include Black Country provision in the Shropshire requirement the Inspectors found unsound). The Inspectors did not say in ID28 they found either need or the assessment of additional growth for Shropshire unsound or ask for them to be revisited. Conversely, para 13 of ID28 confirms the Inspectors consider the Council's approach to identifying the housing and employment land needs within Shropshire sound. The Inspectors restate this unequivocally in ID36 paras 5, 6, 9 and 10.</p> <p>-Consider the housing requirement for Shropshire should remain 30,800 dwellings as within the submission plan. The agreed contribution of 1,500 dwellings to the Black Country should then be added to this Shropshire requirement to generate the overall plan requirement of 32,300 dwellings.</p> <p>-Consider the employment land requirement for Shropshire should remain 300ha as within the submission plan. The agreed contribution of 30ha of employment land to the Black Country should then be added to this Shropshire requirement to generate the overall plan requirement of 330ha.</p> <p>-However, a further two years should also be added to the plan period (see objection A119 B001) so that it extends to 2040. This would result in a housing requirement of at least 35,100 dwellings and an employment land requirement of at least 357ha.</p>	<p>1. Shropshire Council considers that the assessment of reasonable housing and employment land requirement options within the additional Sustainability Appraisal (SA) is consistent with the expectations of the Planning Inspectors with ID28 and ID36. Before undertaking this assessment work, the Council sought further clarification from the Inspectors regarding the scope of this assessment work and received this within ID37.</p> <p>Paragraph 5.7 of ID37 stated "<i>What the SA should do is test options based on the 2020 baseline with 2 extra years, but only look at the growth options tested in the original SA, so a 5, 10 and 15% uplift and look at this with the Black Country unmet needs of 1,500 homes and without it. The results of the SA should then be used to assess what is an appropriate housing requirement in the Plan. The Plan should then make clear what the housing requirement for Shropshire is and how much of the Black Country unmet needs are being accommodated in the Plan. This should be included in Policy SP2 as well as the explanatory text which will need modifying accordingly.</i>" (paragraph 5.8 of ID37 then indicated the expectation of a similar approach for employment).</p> <p>Paragraph 6.5 of ID37 then stated "<i>What is important is that further SA work is robust, tests different levels of growth (including with and without the Black Country unmet needs). For consistency and clarity these should be the same growth options as the original SA. The housing requirement is a matter for the Council, informed by the new work set out in paragraph 5.7 above.</i>"</p> <p>Shropshire Council considers that the assessment of reasonable housing and employment land requirement options within the additional SA; the subsequent planning judgement exercise summarised within the Housing and Employment Topic Paper and the proposed modifications to the draft Shropshire Local Plan to reflect the conclusions of this process are legally compliant and sound.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A119	B003	Updated Housing and Employment Topic Paper.	General comments	No	No	<p>1. The approach to accommodating proposed increases to the housing and employment land requirements through an increased windfall allowance is not positively prepared, justified or consistent with national policy. This increase should be accommodated through site allocation(s).</p> <p>2. The increase to the housing requirement resulting from the addition of the Black Country provision to the Shropshire requirement (Shropshire need and Shropshire growth factor) is 500 dwellings. This can only result in a reduction to the Shropshire requirement which is neither legally compliant or sound. Consider the net increase should be higher - see A119 B001 and A119 B002.</p> <p>3. Notwithstanding this, as 1,500 of the net additional dwellings are specifically to accommodate contributions to the Black Country, allocations to accommodate uplifts to the housing requirement should be qualitatively and locationally suited to meeting these needs. Such locations need not accord with the development strategy in the submitted plan which has been found unsound in respect of responding to the needs of the Black Country.</p> <p>4. None of the allocations in the draft Shropshire Local Plan (for Shropshire's requirements), have been found unsound by the Inspectors, as such they cannot be de-allocated for this purpose and re-allocated to accommodate contributions to the Black Country. They are also not suited for this purpose.</p> <p>5. Logic concludes the net addition of 500 dwellings proposed to the housing requirement is the total provision the Council is proposing to Black Country needs. This is 1,000 dwellings short. Furthermore, these 500 dwellings are not proposed to be provided through identification of specific sites as the Inspectors have requested. The increased windfall allowance at Whitchurch has no relationship to the Black Country; and at Shrewsbury and the Ironbridge Power Station are also some distance from the Black Country, meaning that increased windfall provision in these locations (even if it materialises), would not meet the needs of the Black Country. Development in all these settlements would access the Black Country via the M54, passing the Junction 3 site (which is supported by the Black Country and the benefits of it are identified in the M54 Strategic Development Corridor Vision and Strategy appended to the response). Identifying provision much further from the Black Country (up to 5 times) than Junction 3, is unjustified and inconsistent with national policy.</p> <p>6. To rely on windfall provision, the National Planning Policy Framework (NPPF) states there should be compelling evidence they will provide a reliable source. Evidence provided by the Council points to greater provision from windfall than had been anticipated in the plan period to date, but that could simply mean the finite supply from windfall sources has come forward more quickly than anticipated and not that the supply has increased. On the contrary, capacity of windfall sites/all sites for housing and employment can be expected to significantly reduce due to the need to accommodate biodiversity net gain (BNG) - the draft Shropshire Local Plan provides no policy dealing with BNG, reflecting the fact it was submitted pre-royal assent of the Act, so there is no certainty about the capacity of sites/windfall sites.</p> <p>7. The additional 2,800 dwellings required to increase the plan period by 2 years should be located in accordance with the strategy for the distribution of development in the submission version of the plan. There could be sustainability benefits if additional housing provision for Shropshire is co-located with housing and employment provision for Black Country needs.</p>	<p>1, 3, 5 and 6. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>2, 5 and 7. See response to A119 B001 and A119 B002.</p> <p>3-5. The submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>6. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p> <p>6. Draft Policy DP12 of the draft Shropshire Local Plan requires the achievement of 10% biodiversity net gain (BNG). This requirement, alongside the requirements of other policies in the draft Shropshire Local Plan, informed the approximate site capacities of proposed allocations and windfall allowances in the draft Shropshire Local Plan. Compliance with this draft policy and other draft policies in the draft Shropshire Local Plan informed the Council's consideration of the suitability of settlement guidelines and windfall allowances mechanism to accommodate the proposed uplift to the housing requirement.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A119	B004	Updated Housing and Employment Topic Paper.	General comments	No	No	<p>1. The approach to accommodating the proposed increase to the employment land requirement, through utilising settlement guidelines and windfall allowance is not positively prepared or justified. This should be provided through additional site allocation(s).</p> <p>2. The increase to the employment land requirement resulting from the addition of the Black Country provision to the Shropshire requirement (Shropshire need and Shropshire growth factor) is 20ha. This can only result in a reduction to the Shropshire requirement which is neither legally compliant or sound. Consider the increase to the employment land requirement should be higher - see A119 B001 and A119 B002. The net increase required to be accommodated over the period to 2040 is 57ha and should be accommodated through site allocation(s).</p> <p>3. Notwithstanding this, as 30ha of the net additional employment land is to accommodate contributions to the Black Country, allocations to accommodate uplifts to the employment land requirement should be qualitatively and locationally suited to meeting these needs. Such locations need not accord with the development strategy in the submitted plan which has been found unsound in respect of responding to the needs of the Black Country.</p> <p>4. None of the allocations in the draft Shropshire Local Plan (for Shropshire's requirements), have been found unsound by the Inspectors, as such they cannot be de-allocated for this purpose and re-allocated to accommodate contributions to the Black Country. They are also not suited for this purpose.</p> <p>5. Logic concludes the net addition of 20ha proposed to the employment land requirement is the total provision the Council is proposing to Black Country needs. This is 10ha short. Furthermore, this 20ha of additional employment land is not proposed to be provided through identification of specific sites as the Inspectors have requested. The Council states the source of the additional windfall employment sites is existing sites which come around for redevelopment and redevelopment of rural premises and unspecified previously developed land, without compelling evidence to support this approach.</p> <p>-Supply of other previously developed land is far from certain, particularly given the Council's increased reliance on windfall housing, which is likely to make first claim on available previously developed land.</p> <p>-Redevelopment of existing employment sites is not net additional employment land and is in effect double counting.</p> <p>-Redevelopment of agricultural sites for employment is less likely following recent relaxation of agricultural to residential permitted development rights and are more likely to be small-scale in non-strategic locations so less attractive to employers.</p> <p>-SHF018b&SHF018d should be considered as meeting Shropshire requirements in accordance with the submission version of the draft Shropshire Local Plan. As such, this poor quality, uncertain, piecemeal proposal is, in effect, proposed to meet the Black Country needs.</p> <p>6. The additional 27ha required to increase the plan period by 2 years should be located in accordance with the strategy for the distribution of development in the submission version of the plan. There could be sustainability benefits if additional housing provision for Shropshire is co-located with housing and employment provision for Black Country needs.</p>	<p>1, 3, 5 and 6. Shropshire Council considers the proposed mechanism to accommodate the uplift to the employment land requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the employment land requirement.</p> <p>2, 5 and 6. See response to A119 B001 and A119 B002.</p> <p>3-5. The submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>5. The proposed mechanism for accommodating the uplift to the employment land requirement involves utilisation of existing settlement guidelines and windfall allowances. The Council have an identified employment land supply which totals 413ha of land and includes proposed 'saved' allocations, proposed new allocations and smaller scale windfall development which comprises both brownfield and greenfield land and the redevelopment of premises on established employment areas, within settlements and in rural locations. This robust supply in terms of volume, choice and distribution is capable of meeting the uplift in the requirement and providing flexibility to respond to changing circumstances during the Plan period to 2038.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A119	B005	Updated Housing and Employment Topic Paper.	General comments	No	No	<p>1. De-allocating part of sites submitted for Shropshire's housing requirement and re-allocating to accommodate contributions to the Black Country is not legally compliant, positively prepared, justified, effective, or consistent with national policy. There is no basis for the de-allocation of parts of these sites and the sites are not sound proposals for meeting the Black Country housing needs. These sites were included within the submission version of the draft Shropshire Local Plan and the purpose and justification for their allocation cannot change unless the Inspectors find that the original purpose for which the sites have been proposed for allocation (for Shropshire's needs) is unsound.</p> <p>2. New site(s) which are qualitatively and locationally suited to meeting the needs of the Black Country, should be allocated with capacity for 1,500 dwellings, to meet the increased housing requirement resulting from the 1,500 dwelling contribution to the Black Country.</p> <p>3. Please see related objection to the reassessment of housing and employment needs/additional Sustainability Appraisal.</p>	<p>1-2. The submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>3. See response to A119 B001, A119 B002 and A119 B003.</p>	No
A119	B006	Updated Housing and Employment Topic Paper.	General comments	No	No	<p>1. De-allocating part of sites submitted for Shropshire's employment land requirement and re-allocating to accommodate contributions to the Black Country is not legally compliant, positively prepared, justified, effective, or consistent with national policy. There is no basis for the de-allocation of parts of this site and it is not sound for it to meet the Black Country employment land needs. The site was included within the submission version of the draft Shropshire Local Plan and the purpose and justification for its allocation cannot change unless the Inspectors find that the original purpose for which the site has been proposed for allocation (for Shropshire's needs) unsound. Para 15 of ID36 explains sites included in the submission version of the draft Shropshire Local Plan and assessed through the SA supporting it are based on evidence relating to meeting the needs of Shropshire only.</p> <p>2. New site(s) which are qualitatively and locationally suited to meeting the needs of the Black Country, should be allocated for 30ha of employment land, to meet the increased housing requirement resulting from the 30ha employment land contribution to the Black Country - justification for the allocation of SHF018b and SHF018d cannot be ignored because the Council now considers the same sites could be used for a different purpose.</p> <p>3. Please see related objection to the reassessment of housing and employment needs/additional Sustainability Appraisal.</p>	<p>1-2. The submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>3. See response to A119 B001, A119 B002 and A119 B003.</p>	No
A119	B007	Updated Housing and Employment Topic Paper.	General comments	No	No	<p>1. Proposed allocations to accommodate contributions to the Black Country are not consistent with requirements for Authorities Monitoring Reports in regulation 34 (3) of the Town and Country Planning Act and therefore not consistent with national policy or the Inspectors' requirements for monitoring in para 26 of ID28. They are split between meeting the Shropshire requirement and the contribution to the Black Country, as such until the site is completed and the Shropshire requirement contribution deducted, it is not possible to measure delivery of housing/employment for the Black Country. Delivery at the end of each site's development will push delivery for the Black Country needs to later in the plan period. This is inappropriate and does not assist the Black Country with adequately meeting current needs.</p> <p>2. The site(s) proposed to accommodate the 1,500 dwelling and 30ha employment land contribution to the Black Country should be solely for this purpose, to enable clear and unambiguous monitoring of the delivery of this strategic policy objective.</p>	<p>1 and 2. Shropshire Council considers the proposed approach to accommodating contributions to the Black Country is consistent with regulation 34 (3) of the Town and Country Planning Act and para 26 of ID28. The Council is able to record the dwellings completed on relevant sites for the purposes of meeting the total housing and employment land requirements and the specific component of the overall housing and employment land requirements that constitute the proposed contributions to the Black Country, in the period in respect of which the report is made, and since the policy was first adopted.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A119	B008	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments	No	No	<p>1. The additional Sustainability Appraisal (SA) is not legally compliant as it does not take account of the objectives of the Plan in considering the Black Country need and does not consider reasonable alternatives to the Council's preferred option; as required by the Environmental Assessment of Plans and Programmes Regulations. It is also not positively prepared, justified, effective or consistent with national policy. The Inspectors provided guidance on the scope of the additional SA in ID28 and ID36. This included:</p> <ul style="list-style-type: none"> -The need to have regard to different objectives, and measures of assessment when considering the Black Country provision in contrast to the Shropshire provision (ID 28 para 19). -Site(s) to accommodate Black Country contributions are likely to be located close to the Council's administrative boundary with the Black Country (ID28 para 22) (consider the underlying basis for allocations in the draft Shropshire Local Plan cannot change and neither can the assessment of need for Shropshire's purposes, so additional to those in the submitted Plan are required). -Unlikely contributions to the Black Country could be met without release of Green Belt (ID28 para 23); -Rejection of P26 Amended/P26 Amended v2 unjustified as it was on the basis non-Green Belt locations existed to accommodate contributions to the Black Country, but SHF018b&SHF018d is in the Green Belt (ID36 para 19). -There is a need to assess alternatives to SHF018b&SHF018d in the Green Belt (ID36 para 21). -Illogical that availability, size and strategic suitability criteria is not updated to reflect the purpose of the assessment (ID36 para 21). -Principles indicated apply equally to other sites, not just those of interest to Aardvark (ID36 para 23) (consider the Inspectors are expecting the Council to consider suitability of a range of additional sites to accommodate contributions to the Black Country. In addition to considering other Green Belt sites with less harm to the Green Belt, should also consider other Green Belt sites that have the potential to perform more strongly than the Councils proposed site against relevant environmental, economic and social objectives. Reasonable options include sites specifically promoted to accommodate contributions to the Black Country and sites not allocated due to lack of exceptional circumstances - notably land at J3). -Content with consideration of the broad geographical area of search to meet the Black Country need (but no endorsement of sites); content with the Council's explanation all available sites have been assessed (but the assessment needs to be appropriate); query whether there has been consideration of alternatives to SHF018b&SHF018d with less harm to the Green Belt (consider this should also consider whether alternatives can better meet the need - weighed against harm); further discussion on filtering in stage 2b and assessment in stage 3 of the SA can occur at the hearings if necessary (ID37 para 7.1-7.5). <p>2. The SA objectives are not appropriate to assess sites to accommodate contributions to the Black Country.</p> <p>3. The stage 2b and stage 3 assessments only consider factors relevant to Shropshire, not Black Country specific purposes (factors applied to the final stage 3 assessment are the most critical and focus on Shropshire, they are not specific to the Black Country).</p> <p>4. The assessment of alternatives in the additional SA does not accurately include the BRE J3. P26 Amended and P26 Amended v2 are treated as proxies for this site, but they are quite different in geographic extent and the features they contain. This effects consideration of Green Belt, landscape ecology etc. There is no objective assessment of BRE J3. It also fails to explain how positives/negatives have been weighed up.</p> <p>5. The additional SA was not objective and has been prepared to support commitments made by the Council at Cabinet meetings in July and December</p>	<p>1-9. Shropshire Council considers that an objective, robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 12 and 16 of the Housing and Employment Topic Paper.</p> <ul style="list-style-type: none"> -Before undertaking this assessment work, the Council sought further clarification from the Inspectors regarding the scope of this assessment work and received this within ID37. The Council considers the assessment process aligns with the guidance in this document. -Outcomes were not pre-determined or constrained by previous Cabinet Reports. -The Council considers that this process inherently considered the objectives of the draft Shropshire Local Plan in arriving at conclusions. -The Council considers the process included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed. This process was informed by a Green Belt Assessment and Review which the Council considers is proportionate and robust. -The purpose of these documents were to assess the performance of Green Belt and the harm to the Green Belt that would result from removing parcels for development. These conclusions are relevant irrespective of the 'need' to be met by the development. <p>2. Shropshire Council considers that the SA Objectives are appropriate to assess the sustainability of sites to accommodate the needs of Shropshire and any contribution to the Black Country. These SA objectives were identified through the 'Scoping' stage of the SA process and the Council also considers it is important to utilise a consistent 'yardstick' for SA process.</p> <p>3. Shropshire Council considers that stage 2b of the site assessment process, which involved a 'filter' to 'narrow down' the sites considered in Stage 3 of the site assessment process to be appropriate for both the assessment of the sustainability of sites to accommodate the needs of Shropshire and any contribution to the Black Country. Notably the Inspectors identified that they did not consider further work was required on this matter within ID37.</p> <p>3. Shropshire Council considers that Stage 3 of the site assessment process is appropriate for both the assessment of the sustainability of sites to accommodate the needs of Shropshire and any contribution to the Black Country. It considered all reasonable sites; the general assessment considerations are relevant irrespective of the 'need' to be accommodated; and it involved additional assessment considerations regarding the relationship of the site and where appropriate the associated settlement to the Black Country; and the potential of the site to accommodate all or part of the proposed contribution to the Black Country. Notably the Inspectors identified that they did not consider further work was required on this matter within ID37.</p> <p>4, 7, 8 and 9. Shropshire Council considers that the site assessment process appropriately assesses all reasonable sites, including BRE J3. The assessment recognised that "extensive areas of land within the site promotion are not proposed for development but represent opportunity areas for providing public benefit - this includes land to the east of the A41 and land at and in proximity to Lizard's Hill, relevant proposals for</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						<p>2020 (appended to the response) that additional sites are not required to accommodate contributions to the Black Country.</p> <p>6. Question whether consideration of Green Belt in the site assessment was appropriate. This was reliant on the Green Belt Assessment & Review of performance and harm, but have significant concerns about this.</p> <ul style="list-style-type: none"> -It was based on Shropshire needs only. -Continues to inaccurately assess the BRE J3 site through consideration of unrepresentative land parcels (it consists of the eastern part of P8; western part of P25 and none of P26). -Fails to take account of the fifth of the five purposes of Green Belt, on the misconception it scores equally for all sites and all purposes. Consider this is not the case as it depends on the purpose - strategic employment development cannot be accommodated through urban regeneration, but other forms of development can. <p>7. The Green Belt Assessment data indicates BRE J3 has a lesser impact on the Green Belt than SHF018b&SHF018d (although consider the assessment overstates the value of P25 relative to P14). This is enhanced as BRE J3 does not involve the whole parcel so its impact is reduced, whilst SHF018b&SHF018d involves the loss of the whole parcel. As such, there is no sound reason in the SA to reject BRE J3 and prefer SHF018b&SHF018d to accommodate contributions to the Black Country; or to conclude exceptional circumstances exist for SHF018b&SHF018d but not BRE J3. Site specific Green Belt assessment forms part of the respondents Regulation 19 representation.</p> <p>8. Benefits of allocating BRE J3 identified within the response. This includes:</p> <ul style="list-style-type: none"> -EV072 prioritises the site as it has the potential to provide fit for purpose employment land that meets the needs of modern occupiers and responds to market demand; would directly respond to Shropshire's economic vision of balanced employment and housing growth in an accessible location; and support economic growth aspirations and achieve substantial economic benefits. -EV072 states employment for strategic and local needs should be distinguished. -Since the Strategic Sites consultation the Council/conclusion that exceptional circumstances do not exist for release of BRE J3 the Council has agreed contributions to the Black Country and ID28, ID36 and ID37 have been published. These enhance the justification for the site. -The response is supported by the masterplan for the site and a letter submitted to the Treasury Solicitor dated 24 April 2024. <p>9. As Green Belt release is proposed to accommodate proposed contributions to the Black Country, there must be exceptional circumstances justifying the release of land from the Green Belt for this purpose. Having established exceptional circumstances exist, the correct approach should be to consider all reasonable alternatives to meet that need and lack of exceptional circumstances cannot be a consideration in that assessment. It appears the BRE J3 site has not been considered objectively or fairly as an alternative to SHF018b&SHF018d within the additional SA.</p>	<p>this land could occur whilst it remains in the Green Belt. As such the extent of the site promotion for development/release from the Green Belt is substantially smaller than the total site area, being around 370ha. This has been recognised within the assessment as has the potential for a smaller scheme and/or a single form of development."</p>	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A119	B009	Updated Green Belt Topic Paper.	General comments	No	No	<p>1. The Green Belt Topic Paper only reports conclusions rather than informing the site selection process to meeting Black Country needs. As such, it is not justified. It is apparent from paragraphs 4.17-4.20 that the Sustainability Appraisal (SA), was undertaken to identify sites to accommodate contributions to the Black Country and then the exceptional circumstances justified post decision. It should be utilised as an important component of the site selection process to meet Black Country needs, but that approach has not been taken. It should:</p> <ul style="list-style-type: none"> -Assess accurately the Green Belt credentials of alternative sites and feed back into the SA, which should assess the relative merits of alternative sites to meet the needs of the Black Country, weighed together with the level of harm to the Green Belt. -State that exceptional circumstances exist to meet the employment needs of the Black Country, as the Council's evidence indicates this is the case. -Respond to the re-assessment of the Housing and Employment Topic Paper (to consider whether there is land available to meet the increased housing requirement identified). If further Green Belt release is required due to this, it should assess the relative merits of alternative sites to meeting this need taking account of the objectives/geographical scope of the Plan. The results should be fed back into the SA, which should assess the relative merits of alternative sites to meet the needs of the Black Country, weighed together with the level of harm to the Green Belt. <p>2. The exceptional circumstances proposed for SHF018b&SHF018d are unique/weigh in favour of that site, but there is no justification for such an approach (and no explanation of why exceptional circumstances that previously existed to allocate the whole site for Shropshire's needs is now considered to have fallen away). The exceptional circumstances are the need to provide for the Black Country in a suitable location and with a suitable quality of site and an inability to do so from land not within the Green Belt (applies to all sites). The final assessment of sites should then occur in the SA, through the weighing of the respective benefits of each site with its respective harms. This exercise has failed as sites were selected first and not informed by weighing the respective benefits (taking account of appropriate Plan objectives) with respective harms.</p> <p>3. The document does not adequately respond to the Inspectors request in paragraph 23 of ID28 for clear and distinct assessments of the exceptional circumstances for releasing Green Belt for Shropshire and Black Country purposes.</p> <p>4. For reasons set out in the wider response, the Council was motivated to not allocate additional sites and has therefore sought to make the existing sites fit the Black Country purpose.</p>	<p>1-4. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>1-4. This site assessment process included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p> <p>1-4. Shropshire Council considers the Green Belt Topic Paper effectively summarises the process undertaken to consider reasonable alternatives and summarises the exceptional circumstances where release of Green Belt is proposed - and distinguished which exceptional circumstances were associated with accommodating housing/employment contributions to the Black Country.</p>	No
A120	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments	Not Specified	No	<p>1. References to options "likely to have a higher positive impact" made repeatedly but are unsupported. These statements would be more credible if evidenced by reference to experience.</p>	<p>1. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements. Professional judgement is utilised in applying this methodology.</p>	No
A120	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.22 and 12.23	Not Specified	No	<p>1. Paragraph 12.24 refers to information on migration patterns (reproduced from GC4i - Housing Topic Paper). This is selective and to assess the relevance of this information it is necessary to refer back to the earlier report, which gives data on the scale of migration and the base period for the data. The need does not facilitate consultees providing informed responses.</p>	<p>1. The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Shropshire Council considers that this summary is clear and concise and identifies an appropriate assessment geography within which reasonable options for accommodating contributions to the Black Country will be located.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A120	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.22 and 12.23	Not Specified	No	1 .Based on figure 7 of GC4i (Housing Topic Paper) net migration to Bridgnorth Place Plan Area is around 201 people. The source of the migration into Bridgnorth from the individual Black Country areas is not itemised. It is necessary to have an understanding of the scale of existing migration to form a judgement as to the appropriateness of an additional level of development to meet future Black Country unmet housing needs proposed for a settlement.	1. The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Shropshire Council considers that this is an appropriate assessment geography within which reasonable options for accommodating contributions to the Black Country will be located. Shropshire Council also considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.	No
A120	B004	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.59	Not Specified	No	1. There is not reference to the scale of likely unmet needs for each of the Local Authorities in the Black Country, they are treated as a whole. Presumably updated Duty to Co-operate discussions with the individual Black Country Local Authorities will be required in due course, as these Authorities are no longer preparing a joint plan - examples of the progress/unmet needs identified for each Local Authority provided.	1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.	No
A120	B005	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 12.87	Not Specified	No	1. Proposed contributions to the unmet housing needs forecast to arise in the Black Country allow homes to be built, but do not provide a mechanism which facilitates migration. 2. Whether the proposed scale of contributions to the Black Country proposed at specific locations is realistic in the context of established migration patterns from individual areas within the Black Country, particularly those where a large shortfall is projected to arise, has not been adequately addressed. For example 600 homes at BRD030 would equate to 110 additional migrants per years (assuming adoption in 2026), a 55% increase on established levels.	1. The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Shropshire Council considers that this is an appropriate assessment geography within which reasonable options for accommodating contributions to the Black Country will be located. Shropshire Council also considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.	No
A120	B006	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Footnote on page 302	Not Specified	No	1. It appears Sustainability Appraisal of individual settlement strategies is not undertaken, relying on the overall conclusions of the assessment of the Shropshire spatial approach and the individual site appraisals. Consideration should be given to whether the individual site assessments provide an adequate assessment of the sustainability of the proposed scale of development for the settlement in which they are situated.	1. The additional Sustainability Appraisal (SA) assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements. The various reasonable options for the level and distribution of development are the subject of SA. Furthermore, the spatial strategy within the draft Shropshire Local Plan (within draft Policy SP2 and other strategic policies) is the subject of SA. Draft settlement Policies S1 to S20 implement draft Policy SP2 (they show how SP2 applies, but they are not considered to represent reasonable alternatives for SA purposes), as such they were not subject to separate SA within the Sustainability Appraisal and Site Assessment Environmental Report undertaken to inform the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A120	B007	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Appendices	Not Specified	No	1. It is difficult to comment meaningfully on the updated site appraisals. The consultation material did not include a map so it is difficult to identify which sites are being assessed, and there is no indication provided of what has been changed since the previous version. Concerned respondents may not have sufficient information to respond.	1. The additional Sustainability Appraisal (SA) supplements the Regulation 19 Pre-Submission Draft Shropshire Local Plan 2016 to 2038: Sustainability Appraisal and Site Assessment Environmental Report and Appendices (SD006.01-SD006.22). These appendices include an interactive map illustrating the location of all sites within Stage 2 and 3 of the site assessment process. The Council considers this consultation is appropriate and consistent with its Statement of Community Involvement and national requirements.	No
A120	B008	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Appendix 1	Not Specified	No	1. In conducting the Stage 2a assessment no account is taken of the size of the site and the scores are not weighted by the size / scale of potential development.	1. Noted. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements. Stage 2a forms an important component of the assessment process, considered alongside a range of other information (including consideration to the size/scale of a site) when undertaking the planning judgement exercise utilised to identify proposed allocations in Stage 3 of the site assessment process.	No
A120	B009	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Appendix 1	Not Specified	No	1. A "Black Country Sustainability Conclusion" has been added to the Stage 2a assessment for individual sites but it is not clear how this has been arrived at.	1. Chapter 12 of the additional Sustainability Appraisal explains the methodology for this assessment.	No
A120	B010	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Appendix 1	Not Specified	No	1. Appears proximity and transport links are key factors in concluding Bridgnorth is a suitable location to accommodate contributions to the Black Country. However, there is variance between accessibility to each of the Black Country Authorities (which are treated as a whole despite now preparing separate plans). Wolverhampton and Dudley are more accessible than Sandwell or Walsall, but there are still differences in accessibility between Wolverhampton and Dudley. The centre of both Wolverhampton and Dudley is a 35-40 minute car journey and there is little difference in total journey time between Bridgnorth and other locations in its Place Plan Area. The differences between individual sites in their effectiveness at meeting Black Country needs should thus largely be discounted and regarded as subsidiary to local impacts e.g. extra road traffic can have a more detrimental impact in some locations than others.	1. The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Shropshire Council considers that this is an appropriate assessment geography within which reasonable options for accommodating contributions to the Black Country will be located. Shropshire Council also considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.	No
A120	B011	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Appendix 1	Not Specified	No	1. BRD030 is given positive scores for proximity to a primary school, proximity to a public transport node and being wholly/partly brownfield. These are all disputed, consider the score should be reduced by 4 to -12 (poor overall). Furthermore, these factors make minimal contribution to the sustainability of the site.	1. Noted. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements. It should be noted that measurements within the Stage 2a SA are 'as the crow flies' and previous industrial / potentially contaminated land is often found within agricultural fields. Stage 2a forms an important component of the assessment process, considered alongside a range of other information when undertaking the planning judgement exercise utilised to identify proposed allocations in Stage 3 of the site assessment process.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A120	B012	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Appendix 4 (Pages 6-65 regarding BRD030)	Not Specified	No	1. The implications of the new draft policy on Provision for Older People and those with Disabilities and Special Needs on the sustainability of BRD030 has not been considered. The topography of the site may present an issue with step-free access and the poor connectivity with existing Bridgnorth facilities may impede the development of specialist accommodation.	1. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process. The Council considers the requirements of the new draft policy are achievable in the context of BRD030.	No
A120	B013	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 6.9 and 7.9	Not Specified	No	1.1 References to the adopted Development Plan as a baseline are confusing, given it only runs to 2026 so does not provide a baseline for the remaining 12 years of the draft Shropshire Local Plan. It is assumed that the reference should be to the submission draft Shropshire Local Plan, but this should be clarified.	1. Noted. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.	No
A121	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Table 12.4 of the additional Sustainability Appraisal. Paragraphs 8.7-8.8 of the updated Housing and Employment Topic Paper. Paragraphs 6.4-6.8 of the updated Green Belt Topic Paper.	Yes	Yes	1. Support the draft Shropshire Local Plan as gradual planned growth is beneficial to communities and businesses. Support the identification of more obvious areas of brownfield land for development and the proposed safeguarded land at Albrighton. It is important that the needs of younger families are met so they can remain in their communities with plenty of green space. 2. Oppose the rapid introduction of 800 homes at Albrighton, contrary to the draft Shropshire Local Plan. This would destroy the local community and negatively effect services. Crucial that the Green Belt/agricultural land is protected.	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A121	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Table 12.4 of the additional Sustainability Appraisal. Paragraphs 8.7-8.8 of the updated Housing and Employment Topic Paper. Paragraphs 6.4-6.8 of the updated Green Belt Topic Paper.	Yes	Yes	1. Support the draft Shropshire Local Plan and gradual development. Oppose large-scale development.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A122	B001	Updated Green Belt Topic Paper.	General comments	Yes	No	<p>1. Support proposed allocation SHR060, SHR158 & SHR161, which represents a significant and unique opportunity to meet the social, environmental, and economic needs of Shrewsbury during the plan period and beyond.</p> <p>2. There appears to be an undefined distinction between the exceptional circumstances to meet Shropshire housing and employment land needs and those which apply to accommodate contributions to the Black Country.</p> <p>3. Disagree that Alveley is not a suitable location to accommodate contributions to the Black Country, given its geography and functional relationship to the area. Cannot see how a site at Shrewsbury represents a better option or how this would “contribute to the achievement of the wider spatial strategy for Shropshire”, as stated in paragraph 7.15 of the document.</p> <p>4. Evidence is unclear as to why the Council have not selected sites in Shifnal to accommodate contributions to the Black Country housing needs but have done so for employment, as the Green Belt Topic Paper focuses on the exceptional circumstances for release of employment land.</p>	<p>1. Noted.</p> <p>2. The consideration of reasonable alternatives and identification of exceptional circumstances identified for the proposed release of Green Belt land for housing/mixed-use development at Alveley are summarised within the Green Belt Exceptional Circumstances Statement (EV051) and subsequent Green Belt Topic Papers (GC4g and GC46 - which is the subject of this consultation). The identified exceptional circumstances relate to ensuring the long-term sustainability of Alveley and achieving a sustainable pattern of development. These exceptional circumstances are distinct from accommodating proposed contributions to the Black Country.</p> <p>3-4. The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Shropshire Council considers that this is an appropriate assessment geography within which reasonable options for accommodating contributions to the Black Country will be located.</p> <p>3-4. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>4. Through the consideration of reasonable sites it has been concluded that there are suitable locations outside the Green Belt to accommodate the proposed contribution to the unmet housing need forecast to arise in the Black Country. For this reason, it was unnecessary to identify exceptional circumstances for the release of Green Belt to accommodate proposed contributions o the unmet housing need forecast to arise in the Black Country.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A122	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments	Yes	No	<p>1. Support proposed allocation SHR060, SHR158 & SHR161, which represents a significant and unique opportunity to meet the social, environmental, and economic needs of Shrewsbury during the plan period and beyond.</p> <p>2. The sites identified to accommodate proposed contributions to the Black Country are existing proposed allocations in the submission version of the draft Shropshire Local Plan to meet the needs arising in the relevant settlement/Shropshire as a whole, not the Black Country. Identifying these sites to accommodate contributions to the Black Country reduces contributions these sites make to addressing Shropshire's housing needs. Furthermore, the purpose of these allocations cannot change from that within the submission version of the draft Shropshire Local Plan unless the original purpose is found to be unsound.</p> <p>3. Question the justification for selecting Shrewsbury as an appropriate location to accommodate part of the proposed contribution to the Black Country. All other settlements are better located. There is a reliance is placed on the Shrewsbury-Wolverhampton Railway Line, but Shifnal is also on this route. Unclear how accommodating the proposed contribution to the Black Country on Shrewsbury sites would contribute to the achievement of the wider spatial strategy for Shropshire.</p> <p>4. If Shrewsbury is deemed an appropriate location to accommodate the proposed contribution to the Black Country, consider proposed allocation SHR057&SHR177 (which scores 'Good' within the SA in respect of Black Country sustainability) or other sites in the settlement (which scores 'Good' within the SA in respect of Black Country sustainability) would be more appropriate site.</p> <p>5. There are unconstrained sites in higher tier settlements outside of the assessment geography, which could make an appropriate contribution to meeting the uplift in the overall housing requirement and would offset the loss of any sites specifically identified to meet the needs of the Black Country, whilst also meeting settlement specific housing requirements.</p>	<p>1. Noted.</p> <p>2-4. The submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>3-4. The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Shropshire Council considers that this is an appropriate assessment geography within which reasonable options for accommodating contributions to the Black Country will be located.</p> <p>5. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No
A122	B003	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	No	<p>1. Support proposed allocation SHR060, SHR158 & SHR161, which represents a significant and unique opportunity to meet the social, environmental, and economic needs of Shrewsbury during the plan period and beyond.</p> <p>2. Consider the proposal that 20% of housing on sites of 250 or more dwellings is too high. It would represent a significant amount of provision on a single site allocation and would be disproportionately high in a market with only a limited number of care providers. Given the identified need for specialist housing within the Strategic Housing Market Assessment (SHMA) and level of development proposed in Shrewsbury, 20% of total housing would deliver 51% of the need for older persons accommodation and 72% of the need for residential care provision. 10% would be a more appropriate figure to ensure that there isn't a negative impact on the deliverability of this strategic site.</p> <p>3. Greater assurances required that specialist housing can represent all or part of contribution to affordable housing and/or employment provision. The wording of paragraph's 14 and 18 are unnecessarily complicated and difficult to interpret. Subsection a-c of 18 should be removed.</p> <p>4. The policy should provide greater clarity on how it will be applied on phased developments. Paragraph 15 is imprecise and should provide greater certainty that the overall quantum of specialist housing would not exceed 20% rather than being applied to individual phases.</p> <p>5. The policy should also set out the circumstances which would allow for an exception based on market evidence.</p>	<p>1. Noted.</p> <p>2 and 5. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Furthermore, within paragraphs 38-41 ID28 the Inspectors concluded that there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. Reflecting these factors, it is considered appropriate to specify the proportions of specialist housing expected on larger development sites.</p> <p>To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken.</p> <p>With regard to the optional building regulations accessible and adaptable housing standards, the proposed standards for general housing are specifically considered within the Whole Plan Viability Assessment.</p> <p>With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes that such housing will be "subject to a viability assessment at the point of a planning application", consistent with national guidance.</p> <p>The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations. However, the Council recognises that viability can vary between the</p>	Yes

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
							<p>different forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution which is responsive to needs and development viability.</p> <p>It is also important to note that many forms of specialist housing represent high-density development and as such can achieve effective use of land enhancing viability, may also constitute a proportion of the affordable housing contribution, and also represents an additional outlet on the scheme, which can increase the sites marker, have positive effects on deliverability, and speed-up timescales - which aligns with Government aspirations.</p> <p>However, it is acknowledged that there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such, the Council is proposing a modification to this draft Policy to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies.</p> <p>Furthermore, consistent with the conclusions of the Whole Plan Viability Assessment a modification is proposed to allow the provision of reduced rates of specialist housing provision where it is demonstrated that this is creating viability concerns for otherwise sustainable schemes.</p> <p>Furthermore, it is recognised that there may be circumstances where a specific site is unsuitable for specialist housing or there is no identified need for such housing in the area; as such the Council proposes a modification to this draft Policy to allow for the provision of reduced rates of specialist housing provision where the Council agrees one or both of these circumstances apply.</p> <p>3. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. Paragraph 18 of the draft policy is clear that specialist housing can constitute affordable housing. However, the Council recognises that the needs for specialist housing extend beyond the affordable sector; furthermore the affordable housing required in Shropshire extends beyond specialist housing. Paragraph 18 recognises this and ensures that an appropriate mix of affordable and specialist housing types/tenures can be achieved.</p> <p>4. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. The level of specialist housing expected on a development of 250 or more dwellings is 20% of the total, irrespective of whether it is phased or not.</p>	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A122	B004	Updated Housing and Employment Topic Paper.	General comments	Yes	No	<p>1. Support proposed allocation SHR060, SHR158 & SHR161, which represents a significant and unique opportunity to meet the social, environmental, and economic needs of Shrewsbury during the plan period and beyond.</p> <p>2. Support the 2020 assessment of Local Housing Need (EV069) being utilised to calculate housing need.</p> <p>3. Support the high growth strategy with a minimum housing requirement of 31,300 dwellings between 2016 and 2038, representing a 500 dwelling uplift of the housing requirement in the submission version of the Plan.</p> <p>4. Object to the proposed approach to accommodating the uplift to the housing requirement (settlement guidelines and windfall allowances). Consider this should be provided through additional site allocations. Paragraph 72 states any allowance for windfall development must be informed by compelling evidence that they will provide a reliable source of supply. The Council states windfall development has been greater than expected in the plan period to date, however this could simply mean windfall sources have come forward more quickly than expected. It does not indicate an increase in windfall capacity. There are reasonable prospects that instead that the capacity of windfall sites and all sites for housing land could significantly reduce due to the need to accommodate biodiversity net gain (BNG).</p> <p>5. No objection to the Council concluding a 1,500 dwelling contribution is the most appropriate and recognise there is no prescribed formula for calculating an uplift to housing need for this purpose. Suggest there should be a review mechanism within policy to reflect any changing requirement within the plan period.</p> <p>6. Object to the Council's proposal to attribute contributions to the Black Country to existing site allocations rather than new sites, more appropriately located to accommodate the need. This appears to be more of an accounting exercise. See wider response.</p> <p>7. The proposed modification to Policy S16.1 and the associated Schedule S16.1(i) to include reference to Black Country contribution is confusing and unnecessary.</p> <p>8. Delivery of homes towards the Black Country needs are unable to be measured until the total delivery from each site is complete and the planned Shropshire requirements deducted. As such the proposed approach does not allow for accurate or appropriate monitoring of delivery for the Black Country as set out by the Inspectors in ID28 para. 26.</p>	<p>1-3. Noted.</p> <p>4. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>4. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p> <p>5. Noted. National Policy includes a review mechanism for Local Plans. Shropshire Council considers this mechanism is appropriate.</p> <p>6. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>7. Shropshire Council considers modifications proposed to draft Policy S16.1 to reflect the conclusions of this additional work are appropriate.</p> <p>8. Shropshire Council considers the proposed approach to accommodating contributions to the Black Country is consistent with regulation 34 (3) of the Town and Country Planning Act and para 26 of ID28. The Council is able to record the dwellings completed on relevant sites for the purposes of meeting the total housing and employment land requirements and the specific component of the overall housing and employment land requirements that constitute the proposed contributions to the Black Country, in the period in respect of which the report is made, and since the policy was first adopted.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A123	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	No	No	<p>1. The draft Local Plan is considered unsound on the grounds the policy targets and standards sought are not justified, positively prepared or effective.</p> <p>2. Viability evidence fails to test viability of housing for older people. This is inappropriate and there is a genuine risk such an approach will halt delivery due to viability. This also creates delay and uncertainty for developers given unfounded expectations that such proposals will be assumed to be viable including full policy requirements when they may not be. Clearly, housing for older people will form part of the housing supply coming forward and should therefore be tested at the plan wide testing stage. To take the approach that such onerous requirements can be determined on a case by case basis is wrong and contrary to national policy and guidance (references provided) given no attempts have been made to determine if these requirements are viable.</p> <p>3. The expectation that 100% of specialist housing for older people or any other specific typology achieves M4(3) standard has not been subject to viability testing as required by national policy and guidance (references provided).</p> <p>4. The draft plan supports the provision of housing for older people and acknowledges a housing need for such housing. By loading the policy requirements and subsequent costs associated with these policies and not testing the viability position, the council has not addressed the requirements of the PPG.</p> <p>5. Recommend the Council update the viability study to assess sheltered and extra care housing typologies and this is subject to further stakeholder engagement.</p>	<p>1-5. To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken. With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes such housing will be "subject to a viability assessment at the point of a planning application". This approach is considered consistent with national guidance.</p> <p>Shropshire Council acknowledges the requirements of paragraphs 2 and 7 of the draft policy are comparable and as such is proposing a main modification to amend this.</p> <p>The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations. Shropshire Council would be very surprised if it was suggested that achievement of M4(3) (wheelchair user dwellings) standard within Building Regulations constitutes an additional cost for any form of specialist housing specifically designed for older people. It is expected that this would be a default design requirement for any such housing to ensure it meets the current/future needs of intended occupiers. It is also important to recognise that much of this form of housing benefits from economies of scale in achieving these design requirements. Finally, the Council would note that this proposed requirement already formed part of the submission version of the draft Shropshire Local Plan.</p>	Yes
A124	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 7.63-7.64 and 4.14-4.21	Yes	Yes	<p>1. Agree that the Green Belt at Albrighton which is high-quality agricultural land and supports some commercial businesses or woodlands and flowers should be protected. Farmers should be supported and food grown locally.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A125	B001	Updated Housing and Employment Topic Paper.	Paragraphs 7.63-7.64, 8.1 and 8.7-8.8	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it supports Albrighton.</p> <p>2. Do not support development on Green Belt land due to impact on the character/infrastructure of the village and lost of agricultural fields. Green spaces are essential for good mental health.</p>	<p>1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A126	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3 of the additional Sustainability Appraisal. Paragraphs 4.14-4.21, 5.24-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan and the balancing of housing needs and protection of green space and Green Belt at Albrighton, achieved through allocation of just ALB017&ALB021 for development.</p> <p>2. Development of P36A and P36B would destroy the character of Albrighton and Boningale. It would also create the need for large employment provision or acceptance of greatly increased traffic.</p> <p>3. The areas identified to accommodate proposed contributions to the Black Country are logical.</p>	<p>1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p> <p>3. Noted.</p>	No
A127	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments - scoring of housing and employment land requirement options	Yes	No	<p>1. There are weaknesses in the additional Sustainability Appraisal (SA) consistent with previous versions. Specifically:</p> <ul style="list-style-type: none"> -The stage 2a scoring should use absolute scores, not scoring relative only to other sites in that particular settlement. -It is insufficient to only consider factors in Criteria 4-6 when assessment potential to reduce CO2 emissions. Factors such as potential for solar gain and distance to supermarkets should have been considered. -The methodology is undermined when it is possible to override a highly negative sustainability score through mitigation. <p>2. The scoring systems are not explained and are simplistic and the conclusions reached as to sustainability are essentially subjective, rather than being driven objectively by evidence.</p> <p>3. The Council consider it cannot total scores across the SA objectives (in part because there are more environmental objectives), but this goes against the</p>	<p>1-8. The additional Sustainability Appraisal (SA) assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.</p> <p>1-8. Shropshire Council considers proposed amended housing and employment land requirements are appropriate. Identification of this proposed housing and employment land requirements was informed by SA of the three reasonable options (each with two variances), which concluded that proposed options were the most sustainable. Identification was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the proposed housing and employment</p>	No

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						<p>heart of SA. There are more environmental factors as those are what are most important for sustainability, in a world faced with both a climate emergency and a biodiversity emergency.</p> <p>4. It is considered that undue weight is given the economic and social pillars of sustainability and insufficient weight to the environmental pillar. For housing: -No scoring is attempted of environmental SA objectives 8, 9 and 11 and only partial scoring of 12. If these were scored option 1a would be even more obviously the most sustainable. -SA objectives 5 and 6 (encouraging sustainable transport, and reducing car dependency) both relate to the move towards less carbon dependent transport, yet they are scored inconsistently. The relative value of these objectives is also not considered, they are just scored 1-6, but encouragement of sustainable transport is based on unidentified schemes, whilst increased care usage is self-evident for high growth options. -Further evidence provided in the appendix to the response.</p> <p>5. Shropshire Council has come to the wrong conclusion as to the most sustainable option for the housing requirement. Based on environmental factors, option 1a is the most sustainable and option 3b (that favoured by the Council) the least. Shropshire Council has concluded, subjectively, that Option 3b is the most sustainable and appropriate option, even though the evidence they themselves have produced points against that. Consider this was pre-determined.</p> <p>6. Would note that when growth options were first consulted upon a significant majority favoured lower growth, but this was disregarded. An inescapable conclusion from this is ordinary people grasped what Shropshire Council has not accepted, lower growth options are more sustainable than higher growth options in the context of climate change.</p> <p>7. Differences between housing and employment scoring identify inconsistencies in approach. -Scores have now been given for SA Environmental objectives 8, 9, 11 and 12. If that is possible in the case of employment land why was it not possible in the case of housing. -In the summary table, identical scores have been offered for several options, rather than the 1 to 6 scoring offered for all scored objectives for housing. -Further evidence provided in the appendix to the response.</p> <p>8. Shropshire Council has come to the wrong conclusion as to the most sustainable option for the employment land requirement. It is considered that undue weight is given the economic and social pillars of sustainability and insufficient weight to the environmental pillar. For employment it is even more apparent than Option 3b (preferred by Shropshire Council), is far and away the worst option against environmental indicators. Yet Shropshire Council has again chosen to believe economic and social indicators outweigh this adverse environmental impact. Option 1b is vastly more sustainable than Option 3b in the case of employment land.</p>	<p>land requirements were appropriate.</p> <p>2. The methodology for the SA is documented within the Scoping Report and additional SA.</p> <p>3, 4 and 8. The Council considers it is not appropriate to 'total-up' the scores, because performance against each of the SA objectives requires consideration in and of itself and 'totalling-up' scores would not achieve this requirement. Furthermore, the SA objectives are diverse and address differing considerations, therefore it is not possible to directly compare them. In addition, there are also more SA objectives that address environmental topics than social and economic topics, as such a 'totalling-up' of scores would create a bias towards environmental factors, when the principle of sustainable development is about achieving balance across all three pillars – social, economic, and environmental.</p> <p>7. It is important to recognise that there are distinctions between the housing and employment options and the likelihood/certainty of their effects on each SA objective.</p>	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A127	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments - uplifts to the housing and employment land requirement options	Yes	No	<p>1. Consider there is no need for the proposed uplifts of 500 houses. The Inspectors guidance in ID37 was ambiguous. It states to “only look at the growth options tested in the original SA” but equates this to “a 5, 10 and 15% uplift”. However, growth options tested in the original SA were not 5%, 10% and 15% uplifts to the baseline.</p> <p>-Based on the July 2023 SA, the Inspectors could have said not “a 5, 10 and 15% uplift” but instead around 5, 10 and 13% uplifts.</p> <p>-Within the submission version of the draft Shropshire Local Plan uplifts for the growth options were 2.7%, 8.1% and 13.1% respectively) or 4.2%, 9.2% and 14.1% including the Black Country contribution).</p> <p>-A small difference in the percentage uplift makes a critical difference to the outcome. Shropshire Council’s approach complies with the Inspectors’ guidance as to the 5%, 10% and 15% uplifts on baseline, but not quite the guidance to “only look at the growth options tested in the original SA”, because of these different percentages as demonstrated above.</p> <p>-It is only the belief that the Inspectors’ guidance required “a 5, 10 and 15% uplift” be assessed, coupled with the subjective preference for Option 3b, that has resulted in the spurious conclusion that a further 500 houses are required. If the guidance to “only look at the growth options tested in the original SA” had been carried out, no extra 500 would have been found to be required.</p> <p>-Further evidence provided in the appendix to the response.</p> <p>2. There are contentious anomalies inherent within the Government’s Standard Methodology, which requires 25,894 houses for a population projected to increase by only 28,380 in the plan period - 1.1 person per house double the norm of 2.2 people per house.</p> <p>3. Employment is more opaque. The EDNA identifies a range for the employment need concluding “the overall range is therefore between 128ha and 234ha gross of employment land between 2016 and 2038”. It is therefore difficult to see where the 250ha baseline need comes from. Instead, it seems the maximum baseline figure should be 234ha but this may be on the high side as the average figure from this range is only 164ha.</p> <p>4. Consider there is no need for the 20ha uplift to the employment land requirement. If 234ha baseline need was utilised and the same uplifts applied, the maximum requirement (Option 3b) would be 299ha. So in reality there is no need for an uplift to the employment land requirement. Further evidence provided in the appendix to the response.</p>	<p>1-4. The additional Sustainability Appraisal (SA) assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.</p> <p>1 and 4. Shropshire Council considers that the options considered within the additional SA are consistent with the growth options tested in the original SA and consistent with the expectations of the Inspectors as documented within ID28, ID36 and ID37.</p> <p>2. Shropshire Council considers Governments Standard Methodology is appropriate to determine local housing need in Shropshire.</p> <p>3. Section 9 of the additional SA explains how the baseline employment land need is calculated.</p>	No
A127	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Accommodating the uplift to the housing and employment land requirements	Yes	No	<p>1. Consider the proposed uplift of 500 dwellings to the proposed housing requirement is not required and has arisen because of ambiguity in the Inspectors’ guidance.</p> <p>2. Had there been a need, would not object to it being accommodated through windfall development (as proposed). However, object to the under counting of windfalls within the supply.</p> <p>2. Consider application of the correct baseline for employment land need (234ha) means there is no need for any uplift of the employment land requirement either.</p>	<p>1 and 3. See response to A127 B002.</p> <p>2. Shropshire Council considers its approach to windfall development within the draft Shropshire Local Plan is appropriate.</p>	No
A127	B004	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Accommodating proposed contributions to the Black Country	Yes	No	<p>1. Because there is no need for an uplift to the previously submitted housing and employment land requirements and the conclusions in ID37 there is no need for section 12 of the additional Sustainability Appraisal.</p>	<p>1. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p>	No

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A127	B005	Updated Housing and Employment Topic Paper.	Black Country Unmet Need	Yes	No	<p>1. Following Shropshire Council's agreement to contribute 1,500 dwellings and 30ha of employment land to the Black Country, work on their joint Local Plan ceased and individual Local Plans for the four Local Authorities are to be prepared. As none have progressed beyond Regulation 18 stage, the quantum of combined Black Country unmet need is therefore still uncertain. This is further influenced by the 2021 census data and the significant opportunities for additional supply on brownfield/windfall land suggested in responses to Local Plan consultations by CPRE.</p> <p>2. It is flawed to identify a contribution to the Black Country. Any assessment of cross-boundary assistance should relate specifically to the individual authorities. In this context note that the most significant unmet need in the Black Country arises in Sandwell, which is less well linked to Shropshire. Furthermore, the unmet need (in as much as it may exist) in Wolverhampton which has the closest links to Shropshire, is primarily due to the 35% uplift in the standard methodology which paragraph 62 of the National Planning Policy Framework (NPPF) states should be accommodated within the Authority it arises for sustainability reasons.</p> <p>3. The implications of the Telford & Wrekin Local Plan also need to be considered (particularly with regard to sustainability and infrastructure implications of high growth in Shropshire and the compounding effect of Telford's growth), where a large element of Black Country unmet need is planned to be met - even though the "official" figure is only for 1,600 dwellings. Appendix to the response relates to the Telford & Wrekin plan making process.</p>	<p>1-3. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p>	No

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A127	B006	Updated Housing and Employment Topic Paper.	Windfall	Yes	No	<p>1. No evidence of need for an uplift of 500 dwellings to the housing requirement, so no need for amendments to settlement guidelines at Shrewsbury (350), Whitchurch (75) and the Ironbridge former Power Station site (75).</p> <p>2. No evidence of need for a 20ha uplift to the employment land requirement.</p> <p>3. There is a severe under allowance for windfalls and therefore overprovision of housing in draft Shropshire Local Plan. Figure 8.1 demonstrates there have been 4,683 windfall completions in the five year period from 2018/19 to 2022/23. Astonishingly, that would be equivalent to 20,605 over a 22-year period. Even if a discount for the next three years is applied (as normal), this would amount to 11,239 dwellings (pro-rata over 12 years) or 4,006 dwellings on small sites. Yet total provision in the draft Shropshire Local Plan is for 2,682 dwellings. Further information in the appendices of this response.</p> <p>4. The windfall data demonstrates settlement guidelines have already been exceeded/over-provision in Broseley, Pontesbury, Weston Rhyn, Baschurch, Shawbury and Prees. Further information in the appendices of this response.</p> <p>5. The Council's proposed approach to accommodating the proposed uplift to the housing requirement is not to consider completions across the county, but to identify three settlements which are likely to have additional windfalls, this approach is opaque and clearly a flawed. Evidence may suggest specific locations where windfalls are likely to occur, but by their nature, the location of windfalls is going to vary, with some locations exceeding expectations. As such, consideration of windfalls should be across Shropshire.</p> <p>6. If there is good evidence of additional housing from windfalls, then less allocations are required. This should also loop-back and information the Sustainability Appraisal of options for meeting housing need.</p> <p>7. There is a severe under allowance for windfalls and therefore overprovision of employment in draft Shropshire Local Plan. The position is anomalous for employment land; settlement guidelines, totalling 375ha, are significantly more than the currently stated revised requirement of 320ha. That in itself is inconsistent and unsound. Further information in the appendices of this response.</p> <p>8. Taking into account the imperative to keep greenhouse gas emissions to a minimum, the housing requirement should be kept at baseline need of 25,894 (plus any fully evidenced Black Country contribution) and the employment land requirement kept at baseline need of 234ha (plus any fully evidenced Black Country contribution).</p>	<p>1-2. See response to A127 B002.</p> <p>1-7. Shropshire Council considers its approach to windfall development within the draft Shropshire Local Plan is appropriate.</p> <p>1-7. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>8. Shropshire Council considers the proposed strategic approach to the level and distribution of development across Shropshire and the proposed strategies for specific settlements (including existing commitments (including existing allocations), proposed allocations and proposed windfall allowances) are appropriate, effective, sustainable and deliverable (for a site to be considered deliverable it needs to be suitable, available and achievable (including viable)).</p>	No
A127	B007	Updated Green Belt Topic Paper.	General comments	Yes	No	<p>1. No further requirement for additional release of Green Belt land.</p>	<p>1. The proposed strategic approach to the level and distribution of development across Shropshire and the mechanisms for achieving this strategic approach are considered appropriate, effective, sustainable and deliverable. It is also considered that the proposed development strategies and the existing and proposed allocations identified to contribute towards achieving this proposed development strategy are appropriate, effective, sustainable, and deliverable. In identifying proposed site allocations, a proportionate and robust site assessment process has been undertaken, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p>	No

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A127	B008	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	No	<p>1. Welcome the main provisions of the draft policy, with the following caveats: -Whilst elderly and disabled prefer to be cared for in their own homes for as long as possible, there are not either the staff or the funding for this on any greater scale than at present. The assumption more 'sheltered flats' are unnecessary is therefore illogical. -The movement of elderly into purpose built flats and other developments, would free up housing and reduce reliance on newbuilds.</p> <p>2. The policy should be reconsidered to include provision for purpose built housing for elderly in new housing developments.</p>	1-2. The Council consider the draft policy effectively aligns with and will facilitate the achievement of the People Strategy for Shropshire. Where older people and those with disabilities and special needs require support, in the first instance this will be achieved thorough the provision of appropriate adaptations, equipment, assistive technology and if necessary domiciliary care to support them to continue to live independently within their existing home. Given the rapid advancements to assistive technologies, it is considered that over the plan period to 2038, the ability to effectively provide support in this way will expand.	No
A128	B001	Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8	Yes	Yes	1. Support the draft Shropshire Local Plan and retention of Green Belt.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A129	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.4	Yes	Yes	1. Support the draft Shropshire Local Plan, including identification of sites at Tasley, Shrewsbury and the Former Ironbridge Power Station to accommodate proposed contributions to the Black Country.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A130	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.4	Yes	Yes	1. Support the draft Shropshire Local Plan as it presents a growth strategy for Albrighton which allows calculated expansion whilst protecting the Green Belt and preventing speculative developments.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A130	B002	Updated Housing and Employment Topic Paper.	Paragraphs 7.63-7.64, 8.7-8.8 and 16.64 and Tables 8.1 and 8.3.	Yes	Yes	1. Support the draft Shropshire Local Plan. Consider the site allocations and timescales for their development in the draft Shropshire Local Plan are sympathetic and appropriate to the size of Albrighton. Any proposed over-development (particularly on the Green Belt, development of which would be detrimental to the rural community) should not be refused.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A130	B003	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 6.4-6.8 and 6.13.	Yes	Yes	1. Support the draft Shropshire Local Plan, which was informed by community engagement. It protects Albrighton by opposing unnecessary development on Green Belt and identifying more suitable locations. Over-development would be detrimental to the rural community.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A131	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.4, 7.63, 7.64, 6.4 - 6.8	Yes	Yes	<p>1. Support the Shropshire Local Plan which extends the development of land around Millfield in Albrighton, controls development and protects the Green Belt.</p> <p>2. Green Belt land should be protected for current and future generations.</p>	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A132	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.24-5.27, 6.4-6.8 and 6.13 Updated Green Belt Topic Paper.	Yes	Yes	<p>1. Fully support the draft Local Plan for Shropshire, it provides protection of the environment and the Green Belt in Albrighton.</p> <p>2. It would be unfortunate if the unique character of Albrighton were compromised by over the top development outside of the Local Plan.</p> <p>3. Agree land should be safeguarded from development and kept clear for houses to be built after 2038.</p> <p>4. Paragraphs 6.4-6.8 well thought out. It is important to residents of Albrighton that the village is not overwhelmed by excessive new developments.</p> <p>5. Good to see that the Plan recognises that there are better places in Shropshire for unmet Black Country needs.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

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A133	B001	Updated Housing and Employment Topic Paper.	Paragraph 8.7 Updated Housing and Employment Topic Paper.	Yes	No	<p>1. Soundness of the plan is questioned in respect of the reliance on windfall housing.</p> <p>2. Support the high growth option favoured by the Council and acknowledge a further 500 dwellings are targeted. It is queried however if the housing guidelines attached to settlements can be achieved with particular regard to the principle centre of Market Drayton.</p> <p>3. The soundness of paragraph 8.3 of the Updated Housing and Employment Topic Paper is questioned. The under delivery of housing experienced during the current plan period in Market Drayton is not helped by the tightly drawn development boundary.</p> <p>4. Propose the settlement boundary is modified to incorporate land to the north of the settlement, a logical addition to the settlement boundary and increasing the capacity for windfall development.</p> <p>5. Whilst ticked the box to appear at the hearing session, only wish to do so if this issue of capacity and the settlement boundary of Market Drayton is to be discussed.</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>2-4. Shropshire Council considers that the proposed development strategy for Market Drayton is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p>	No
A134	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3 Appendix 3 Updated Site Assessment Paragraphs 5.24-5.27	Yes	Yes	<p>1. Strongly support this Plan, concerned removal of more Green Belt would exacerbate flooding.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A135	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, 12.4, 6.4 -6.8, 6.13, 7.63-7.64	Yes	Yes	<p>1. Strongly support the Local Plan, the gradual and well planned growth is beneficial to our community and businesses.</p> <p>2. Strongly oppose the introduction of 800+ homes outside of the local plan, it will destroy the local community and have a negative impact on local services which are already stretched.</p> <p>3. It is essential the Green Belt and agricultural land is protected.</p>	<p>1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A136	B001	Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8	Yes	Yes	<p>1. Support the Local Plan which outlines a measured and controlled future development of the community and protection of the Green Belt</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A137	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, 12.4	Yes	Yes	<p>1. Support the Local Plan, further housing on Green Belt land would not be sustainable.</p> <p>2. Further housing would increase traffic and flooding problems.</p> <p>3. Agree there are more suitable areas for new housing on brownfield sites and nearer to employment.</p>	<p>1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A138	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	Paragraphs 1-81	No	No	<p>1. Paragraph 62 of the National Planning Policy Framework emphasizes the importance of assessing and incorporating housing needs for various community groups, including older individuals. The Council's evidence reveals a significantly higher concentration of older residents within the Plan area compared to the national average.</p> <p>2. This draft Policy is not robust in its wording to ensure that the M4(2) and M4(3) requirements are adhered to. It will be particularly difficult to deliver for large windfall development on previously developed land which usually has viability issues.</p> <p>3. Windfall housing is unlikely to provide specialist housing, provision of which is a concern expressed by the Planning Inspectors.</p>	<p>1. Noted. The Council considers the size, type and tenure of housing needed for different groups in the community has been assessed and is reflected in the draft policies of the draft Shropshire Local Plan.</p> <p>2. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.</p> <p>3. The draft policy identifies and supports opportunities for specialist housing on appropriate windfall sites.</p>	No

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A138	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 2.1-14.5	No	No	<p>1. Support a high growth approach within the proposed housing requirement. However, do not consider the proposed contribution to the Black Country is sufficient, based on the current available evidence which demonstrates that the Black Country Authorities unmet need is increasing.</p> <p>2. To be positive, justified and effective, there needs to be a greater contribution towards meeting the unmet needs arising within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), rather than continuation of the current proposals which will lead to the need for an immediate review of the Plan. This is informed by Changes to national policy (particularly with regard to Green Belt); changes to plan-making in the Black Country and the GBBCHMA (particular reference to South Staffordshire); reductions/uncertainty about contributions proposed to the unmet needs arising in the GBBCHMA; and increases to the level of unmet housing need identified in the GBBCHMA, mean Shropshire should now be adopting a strategy to release significantly more sustainable, suitable and deliverable sites.</p> <p>3. The Sustainability Appraisal (SA) of options to accommodate the proposed uplift to the housing requirement is not transparent and is inconclusive. There are too many question marks for Options 3 and 4, indicating their effect have not been fully analysed/explored and consider outcomes have been pre-determined.</p> <p>4. Disagree with the conclusions reached for SA objectives 2 (windfall development can result in loss of community facilities and employment uses), 3 (not all settlements have sufficient infrastructure to support windfall development) and 4 (windfall development can result in loss of community facilities and employment) of Option 1, within the SA of options to accommodate the proposed uplift to the housing requirement. The SA does not take any account the risk of over-relying on windfall development which is unplanned and the quantity of which cannot be relied upon.</p> <p>5. Consider windfall development opportunities will reduce as they are finite (including opportunities identified in paragraph 5.120 of the Housing and Employment Topic Paper). Whilst windfall completions have increased recently, this is expected due to changes to permitted development rights and flexibility in national policy, but again such opportunities are finite. Furthermore, the EDNA recommends protection of employment sites, but this has not occurred - they cannot be relied upon as a source of windfall housing. Additionally, reliance on windfall means demand shapes places. Sufficient supply means windfall reduces. This has not been considered within the Housing and Employment Topic Paper.</p>	<p>1-2. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>3-4. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>5. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p>	No

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A138	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 2.1-11.1 and 19.1-21.9	No	No	<p>1. Consider the draft Shropshire Local Plan does not conform to guidance in the NPPF or the SEA regulations, which requires proposed allocations to be informed by consideration of reasonable alternatives and to be based on adequate, up to date and appropriate evidence. There is also a requirement to consider economic signals to assess the role and function each settlement and their capacity for development. Consider sites promoted to the Council have not been assessed logically (particularly BAY040 Land at Bayston Hill which represents a reasonable alternative but was not considered in stage 3 of the site assessment); and it is unclear/insufficient justification in provided for proposed allocations.</p> <p>2. BAY039 achieves only a fair score in the stage 2a assessment and BAY040 scores a good score. Therefore difficult to understand why BAY039 is proposed for allocation over BAY040. Consider the stage 2a SA scoring has not influenced the site assessment process.</p> <p>3. BAY040 (Land at Bayston Hill) is suitable, available, achievable and promoted by a developer with an established and proven track record in delivering sites. Proper consideration should be given to the site being allocated for residential development for up to 250 dwellings. The response provides extensive site promotional material and is supported by a vision statement for the site.</p> <p>4. Consider the stage 2a assessment of BAY040 is incorrect with regard to proximity to a children's playground, accessible green space, amenity green space and listed building. Overall rating as good remains but it should have a higher score (4 instead of -3).</p> <p>5. There is unmet housing need arising in Bayston Hill and windfall opportunities are limited. The guideline for the settlement should increase. The response is supported by a housing need assessment for Bayston Hill.</p>	<p>1. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.</p> <p>1. For the avoidance of doubt BAY040 was considered in Stage 3 of the site assessment process.</p> <p>2-5. Shropshire Council considers that the proposed development strategy for Bayston Hill is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process. The results of the Stage 2a SA assessment are specifically considered within the Stage 3 assessment alongside other relevant considerations in reaching the planning judgement regarding proposed allocations.</p>	No
A138	B004	Updated Green Belt Topic Paper	Paragraphs 2.1 -9.26	No	No	1. No specific comments.	1. N/A.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A139	B001	Updated Housing and Employment Topic Paper	All paragraphs, specifically including 13.5, 16.5, 16.7, 16.13, 16.15-16.48, 16.52 and 16.58	Yes	Yes	<ol style="list-style-type: none"> 1. Support the Shropshire Local Plan Review and the proposed employment allocations SHF018b and SHF018d. 2. Shropshire Councils acknowledged need as identified is to progress a high growth and urban focus spatial strategy. Specific contributions of 1,500 dwelling and 30 hectares of employment land to support the unmet needs forecast to arise in the Black Country. This is strongly supported and considered to be appropriately justified by the evidence base previously prepared together with the documents forming part of this consultation. 3. Options for the employment land requirement have been updated and re-assessed by Shropshire Council, including the consideration of the baseline, uplifts of 0%,10% and 15% above the baseline and all options with and without the proposed contribution of 30 hectares of employment land to meet the forecast unmet need. This is an appropriate method which is consistent with requirements. 4. The reasons for a contribution of 30 hectares towards unmet need set out under paragraph 13.5 is considered to be sound and strongly supported. 5. Support the considerations listed in paragraphs 16.5 and 16.7. 6. The assessment appropriately concludes that the specific Black Country needs can be met at SHF018b & SHF018d. 7. Strongly support paragraphs 16.15-16.48 which sets out the reasoning behind the identification of SHF018b & SHF018d as being appropriate. 8. Support Shropshire Councils identification of Shifnal as a settlement well suited to accommodate employment development. 9. The proposal to increase employment provision in Shifnal will help readdress the imbalance that has occurred where housing growth in the town hasn't been supported by sufficient levels of employment growth. 10. The location of Shifnal in east of the County and in close proximity to two of the growth corridors and accessible road and railway links means it is extremely important in meeting the unmet employment need for the Black Country. 11. The 'Shifnal Delivery Statement' produced by Stoford, the Development Partners for the proposed employment allocation in Shifnal (SHF018b & SHF018d) provides further explanation as to why the approach taken is appropriate and why the site at Shifnal is a positive response to the employment land requirements of Shropshire. 12. No comment is made on the appropriateness or not of the other specific sites considered and identified within paragraph 16.52. However the approach taken by Shropshire Council as detailed in paragraphs 16.57 and 16.58 is considered reasonable, justifiable and sound. 	1-12. Noted.	No.

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A139	B002	Updated Green Belt Topic Paper	All paragraphs, specifically 9.23 and 9.24.	Yes	Yes	<ol style="list-style-type: none"> 1. Support the Shropshire Local Plan Review and the proposed employment allocations SHF018b and SHF018d. 2. Shropshire Councils acknowledged need as identified is to progress a high growth and urban focus spatial strategy. Specific contributions of 1,500 dwelling and 30 hectares of employment land to support the unmet needs forecast to arise in the Black Country. This is strongly supported and considered to be appropriately justified by the evidence base previously prepared together with the documents forming part of this consultation. 3. The Land East of Shifnal Industrial Estate (SHF018b & SHF018d) have been appropriately identified to accommodate the unmet needs forecast to arise within the Black Country as well as meeting local Shropshire need. 4. Paragraphs 9.23 and 9.24 summarise the exceptional circumstances to release the land at Shifnal from the Green Belt, it is considered the reasons have been appropriately demonstrated, are sound and are strongly supported. 5. Agree the nature and scale of development within the proposed settlement strategy will maintain and enhance Shifnal's role as a Key Centre. 6. The site will ensure Shifnal provides both a local and regionally important employment base. 7. Employment development in the town would have a positive effect on the sustainability, vitality and viability of the settlement. 8. The 'Shifnal Delivery Statement' produced by Stoford, the Development Partners for the proposed employment allocation in Shifnal (SHF018b & SHF018d) provides further explanation as to why the approach taken is appropriate and why the site at Shifnal is a positive response to the employment land requirements of Shropshire. 9. The site is suitable, available and deliverable to meet the requirements of the draft Local Plan and the needs identified within the supporting evidence base. 	1-9. Noted.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A139	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	All paragraphs specifically including 7.10 to 7.21; 7.25; 7.29 & 7.30; 7.37; 9.22 to 9.79; 9.83 & 9.84; 9.87 to 9.106; 11.8 to 11.45; 11.60; 12.16 to 12.28; 12.39; and 12.47 to 12.59.	Yes	Yes	<ol style="list-style-type: none"> 1. Support the Shropshire Local Plan Review and the proposed employment allocations SHF018b and SHF018d. 2. Support the assessment and findings within tables 7.1 and 7.2 plus the accompanying text within paragraphs 7.1- 7.14 and 7.15 - 7.21. 3. The conclusions reached in paragraphs 7.29 and 7.30 are supported. 4. Shropshire Council are correct in noting that the principle of sustainable development is a balance across the three pillars needs to be achieved. 5. Paragraph 7.37 detailing the reasons why the preferred option to provide a contribution to the Black Country's unmet employment needs are appropriate, are correct and are strongly supported. 6. Support the approach taken in section 9.0 in relation to economic growth, the extended Plan period and the assessment of options. 7. The conclusions in paragraphs 9.87 - 9.105 are consistent, robust and sound. 8. Paragraph 9.106 which details the reasons why the preferred option to prepare for high growth plus a contribution to the Black Country's unmet employment needs, is the most appropriate approach, are correct and are strongly supported. 9. The approach for assessment of options for accommodating employment land uplift alongside the findings are supported. 10. Utilising settlement guidelines and windfall allowances represents the most sustainable of the options for accommodating the uplift to the proposed employment land requirement. The option would align with the urban focus for development, whilst additional employment development would be concentrated in the most sustainable locations. 11. Paragraphs 12.16, 12.17-12.28 setting out the geographical assessment are appropriate, robust and sound. The conclusions are strongly supported. 12. The site assessment process, as detailed in paragraphs 12.47-12.59 is appropriate and sound. 13. Strongly support paragraph 12.87. The conclusions detailed within table 12.5 and within Appendix 2 and 8 are appropriate and sound, reflecting previous assessments. The conclusions reached with regard to the appropriateness of the proposed allocations are strongly supported. 	1-13. Noted.	No
A140	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General Comments	Not Specified	Not Specified	<ol style="list-style-type: none"> 1. The proposed strategic distribution of planned development within the Draft Shropshire Local Plan remains 'Urban Focus'. I do not consider the proposals raise any strategic cross boundary issues for Herefordshire and therefore no comments are made at this stage. 2. No comments to make on the Green Belt Topic Paper. 3. Support the aim of GC25 (Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation) to enable people to remain in their own homes and communities as long as possible and this aligns with the approach in Herefordshire. 	1-3. Noted.	No

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A141	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 6.8, 7.8, 8.8, 8.90, 9.14, 9.106, 10.3-10.4, 10.6, 10.61, 11.3-11.4, 11.6, 11.60, 12.1, 12.30-12.31, 12.23, 12.38, 13.11 and 13.54.	Yes	No	<p>1. Paragraph 6.8 of the additional Sustainability Appraisal (SA) identifies two options for contributions to the Black Country. Strongly support Option 2: '1,500 Dwelling Contribution', as proposed by the Council. This option supports achievement of SA objective 3 (provision of sufficient good quality housing) and helps meet the duty to cooperate.</p> <p>2. Urge the Council to accommodate more of the unmet housing need forecast to arise in the Black Country, consistent with national guidance which identifies the requirement to meet unmet housing need as an appropriate circumstance to plan for a housing need figure than the standard method indicates.</p> <p>3. Support the Council's findings in paragraph 8.90 and consider Option 3b: 'High Growth plus a Contribution to the Black Country Authorities Unmet Housing Needs' is the most sustainable housing requirement option. This supports delivery of affordable housing.</p> <p>4. Consider a greater uplift of housing should be provided beyond Option 3b to ensure that the Local Plan is positively prepared in accordance with paragraph 35 of the NPPF, above and beyond the Government's Standard Method.</p> <p>5. Paragraph 22 of the National Planning Policy Framework (NPPF) states "Strategic policies should look ahead over a minimum 15-year period from adoption...". Timetable for adoption of the draft Shropshire Local Plan has been delayed (with potential for further delay due to the general election and planning reform at the national level) and it is now expected this will occur in 2025, as such consider the plan period should be extended by at least 2 years. This would result in a requirement of at least 35,646 to 2040.</p> <p>6. Consider Option 1 (settlement guidelines and windfall allowances) to accommodate the proposed uplift to the housing requirement is not clear or justified - more evidence required that this will meet the proposed draft Housing Requirement. Consider Option 3 (increasing site allocations) should be utilised as it is the most logical and provides greater certainty of housing delivery and financial contributions to infrastructure; windfall is not guaranteed/cannot be relied on; and site allocations provide greater control over sustainable patterns of development.</p> <p>7. In Highley, consider proposed allocation HNN016 (the site assessment does not confirm that the site has been promoted through the plan making process or that it is deliverable) and windfall required to achieve the settlement housing guideline are not guaranteed.</p> <p>8. With regard to the assessment of options to contribute to the unmet employment land needs forecast to arise in the Black Country, support Option 2 (30ha). This satisfies the Council's legal Duty to Co-operate and accords with the signed Statement of Common Ground (SoCG).</p> <p>9. Support the Council's conclusion that Option 3b: High Growth Plus an employment land contribution to the Black Country Authorities Unmet Housing Needs is appropriate, as it demonstrates compliance with the duty to cooperate; reflects positively the geographic proximity and relationship between Shropshire and the Black Country; it encourages a strong, responsive and competitive economy (consistent with the NPPF); and will improve the sustainability of Shropshire and the Black Country by enabling employment to be delivered in a sustainable manner.</p> <p>10. Given the level of unmet employment land need in the Black Country and the need to extend the plan period to 2040, consider the employment land requirement should be increased to at least 344ha. Otherwise there will be a need for an early review.</p> <p>11. With regard to accommodating the uplift to the employment land requirement, understand the rationale behind the Council's preference for Option 1 (utilising settlement guidelines and windfall allowances) as it represents the most sustainable of the option. However, the need to increase the employment land requirement further means a need for more site allocations.</p>	<p>1, 3, 8, 9, 12 and 14. Noted.</p> <p>2 and 10. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>4 and 11. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p> <p>5, 10 and 11. Shropshire Council considers the proposed plan period addressed within the draft Shropshire Local Plan is appropriate. Importantly:</p> <ul style="list-style-type: none"> -There is nothing in law requiring a Local Plan to have a minimum 15 year period from adoption. -The National Planning Policy Framework (NPPF) preference for a minimum 15 year period from adoption (paragraph 22) is not a mandatory requirement and shorter timescales can be sound, as established in other Local Plan examinations. The Council considers the primary intention of this preference is to ensure plans are forward-thinking; provide a long-term vision, strategy and basis for sound decision making; and do not unduly restrict growth. This is the case in the draft Shropshire Local Plan, with a spatial strategy underpinned by the principle of 'high-growth'. -The National Planning Practice Guidance (NPPG) on Plan Making addresses the plan period at paragraph 64, indicating that the focus is on ensuring that policies are 'forward thinking' and look over a minimum 15 year period. Again, this is the case in the draft Shropshire Local Plan which addresses a 22 year period and has since submission formed a material consideration in decision making. -The proposed plan period continues to align with that of the latter Regulation 18 and Regulation 19 consultations and crucially the submission version of the draft Shropshire Local Plan. -The proposed plan period aligns with the timescales for the proposed vision, objectives, policy framework and settlement strategies within the submission version of the draft Shropshire Local Plan. -The proposed plan period supports the continuation of the spatial strategy proposed within the submission version of the draft Shropshire Local Plan - consistent with the proposed retention of the 1,500 dwelling contribution towards the unmet housing need forecast to arise in the Black Country and the continuation of the 'high-growth' principle that 	No

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						<p>proposed employment land requirement.</p> <p>12. Agree with paragraph 12.31 that Highley would be able to promote sustainable patterns of development and would also be most likely to meet the needs of the relevant Black Country households. Support the Council's identification of reasonable options to accommodate all or part of the proposed housing and employment land contributions to the Black Country.</p> <p>13. Disagree with the Stage 2a assessment for site HNN026, with regard to proximity to a GP, amenity green space, accessible natural green space. This would take the settlement score from fair to good.</p> <p>14. With regard to the strategic distribution of development, agrees with the Council that Option B: Urban Focus results in more positive effects in relation to the SA objectives. However, should further sites be required those sites adjacent to existing settlements should be considered as a priority over rural locations.</p> <p>15. Land off Netherton Lane, Highley (HNN026) is a suitable location for housing and employment development, including to meet the needs of the Black Country. Extensive supporting information provided about the site within the response. Furthermore a vision document, framework masterplan and supporting assessments are appended to the response.</p>	<p>underpins the spatial strategy.</p> <p>-This approach is a pragmatic response to the numerous factors that have had implications for the timescales of the plan making process and meant that adoption of the draft Shropshire Local Plan has not occurred when envisaged by the Council - which would have allowed for more than 15 years remaining within the plan period at adoption. In particular:</p> <p>>The Covid 19 pandemic which due to necessary measures to safeguard communities had led to direct delays at key stages in the plan making process; had significant implications on Council resources in order to support the response to the Covid 19 pandemic, leading to delays to the plan making process; and resulted in a specific extension to the timescales for the Regulation 19 consultation.</p> <p>>A number of lengthy and complex objections which required due consideration through the Regulation 19 consultation process and during the ongoing examination processes. This includes a Pre-Action Protocol letter which had a specific implication for the timescales of the examination.</p> <p>-This approach is also a pragmatic approach to avoiding the 'cycle' of examination timescales leading to extensions to plan periods, leading to extension of examination timescales.</p> <p>-This approach is also a pragmatic approach to seeking to positively progress the examination and adoption of the draft Shropshire Local Plan in order to facilitate implementation of the sustainable spatial strategy underpinned by the principle of 'high-growth'.</p> <p>-This approach positively responds to the requirement to review Local Plans every five years.</p> <p>Examples of other circumstances where such an approach has been employed include:</p> <p>-The Hart Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraph 32 of their report (published on 10th February 2020), stating: "There has been some suggestion that the Plan period should be extended. The Plan looks forward 13 years after anticipated adoption, which is below the preferred 15 year time period set out in Paragraph 157 of the NPPF. However, the NPPF's preference is not a set requirement and I consider 13 years to be an appropriate time scale in this instance, particularly as there is now a requirement to review plans every five years." Although the NPPF has been revised since the report, Shropshire Council is of the view that the wording relating to the 15 year time period remain largely unchanged.</p> <p>-The Worthing Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraphs 74-76 of their report (published on 14th October 2022), stating "Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption. As submitted, the Plan period runs from 2020 to 2036. It was anticipated that the Plan would be adopted in 2021 and thus would have met this requirement. The Plan has been prepared during the COVID-19 pandemic, which has had understandable consequences in terms of the preparation and submission of the Plan. This means that the Plan will now be adopted in 2022 and will thus have a lifespan of around 14 years. Although the period will now fall marginally short of the 15 years recommended by the NPPF, I conclude that this does not render it unsound. Delaying the adoption of the plan to address any implications for extending the period would be more likely to frustrate, rather than accelerate the delivery of new housing and employment in Worthing. This would be contrary to the Government's objective of significantly boosting the supply of housing and for Councils to have up-to-date plans</p>	

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							<p>in place. On balance, a plan period of up to 2036 would remain broadly consistent with the aims of paragraph 22 of the NPPF in allowing adequate time for the Plan's strategic policies to take effect."</p> <p>6. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>6. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p> <p>7 and 15. Shropshire Council considers that the proposed development strategy for Highley is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process. Site HNN016 has been actively promoted during the plan making process and is considered deliverable.</p> <p>13. Shropshire Council considers the Stage 2a site assessment process is proportionate and robust.</p> <p>15. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and section 9 of the Housing and Employment Topic Paper.</p>	
A141	B002	Updated Housing and Employment Topic Paper.	Paragraphs 2.2, 2.5, 2.10, 2.12, 2.14, 2.21, 2.34, 2.37, 5.2 and 16.118	Yes	No	<p>1. Paragraph 2.2 confirms the draft Shropshire Local Plan proposes a housing requirement of 25,894 dwellings, this is too low. Welcome use of Government's standard methodology, but the National Planning Policy Framework (NPPF) is clear this is the minimum starting point. For the Plan to be positively prepared, the housing requirement should be increased to help a provide affordable homes and help meet the unmet housing needs of the Black Country.</p> <p>2. Welcome the conclusion in paragraph 2.5 that the most sustainable option is a 1,500 dwelling contribution to the Black Country. This aligns with the duty to cooperate.</p> <p>3. Support Option 3b (High Growth plus a 1,500 dwelling contribution to the unmet housing need forecast to arise in the Black Country) as the basis for the proposed housing requirement as this is the most sustainable option for growth. However, strongly suggest an increase to the proposed housing requirement.</p>	<p>1. Noted. Shropshire Council can confirm that Paragraph 2.2 of the Housing and Employment Topic paper relates to need not the proposed housing requirement.</p> <p>2, 8 and 11. Noted.</p> <p>3, 4 and 10. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an</p>	No

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						<p>4. Consider additional allocations should be identified to ensure a 5 year supply and that the draft Shropshire Local Plan achieves the housing requirement in a manner that is “genuinely plan-led” as supported by the NPPF. This should include Land off Netherton Lane, Highley (HNN026), which is a suitable location for housing and employment development, including to meet the needs of the Black Country. Extensive supporting information provided about the site within the response. Furthermore a vision document, framework masterplan and supporting assessments are appended to the response.</p> <p>5. With regard to accommodating the proposed uplift to the housing requirement, support Option 3 (increased site allocations). It is necessary for additional site allocations as: windfall sites should not be depended on as there is no certainty they will be delivered; paragraph 72 of the NPPF specifies windfall allowances should only be made where their is 'compelling evidence' supporting the need for a cautious approach; allocated sites are more suitable and create a more equal distribution of development; and more site allocations are required to support extension of the plan period.</p> <p>6. Do not dispute the sites identified to accommodate proposed housing contributions to the Black Country. However, consider more allocations are required to meet the suggested housing requirement and provide certainty that the proposed 1,500 homes can be met as a minimum.</p> <p>7. Highley is a sustainable location for future development as a Key Settlement and allocating additional housing within Highley will support the Council's objective of meeting the unmet needs of Shropshire and the Black Country.</p> <p>8. Support Option 2 '30ha contribution to the Black Country'. This brings benefits to Shropshire and the Black Country including improving access to / sustainable distribution of employment; supporting the economic vitality of Shropshire and the Black Country; supports the duty to cooperate.</p> <p>9. Consider the benefits of contributions to the Black Country support a higher contribution - at least 30ha.</p> <p>10. With regard to the strategic distribution of development, support Option B Urban Focus and the plan should be amended accordingly. This approach supports the sustainable development of settlements (including Highley); is more sustainable allowing development to access existing facilities; and development in rural locations can come forward on a windfall basis.</p> <p>11. Broadly support the key aims of the revised spatial strategy and would like to emphasise the need for the Council to maximise the delivery of affordable housing to respond to Shropshire's demographic, social and economic needs.</p> <p>12. Consider the housing requirement should be 35,646 over the Plan Period to 2040 and the employment land requirement increased to maximise growth.</p> <p>13. Support identification of Highley as a Key Centre, it is a sustainable location for growth. Additional growth should be identified at the settlement to support delivery of affordable housing, infrastructure provision; meeting local needs; utilised existing infrastructure and providing additional employment opportunities. Land off Netherton Lane, Highley (HNN026) should be allocated for development. It is a suitable location for housing and employment development, including to meet the needs of the Black Country. Extensive supporting information provided about the site within the response. Furthermore a vision document, framework masterplan and supporting assessments are appended to the response.</p>	<p>opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2. For the avoidance of doubt, the strategic approach is underpinned by an urban focus.</p> <p>5 and 6. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>5 and 6. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p> <p>7 and 13. Shropshire Council considers that the proposed development strategy for Highley is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process. Site HNN016 has been actively promoted during the plan making process and is considered deliverable.</p> <p>12. Shropshire Council considers the proposed plan period addressed within the draft Shropshire Local Plan is appropriate. Importantly:</p> <ul style="list-style-type: none"> -There is nothing in law requiring a Local Plan to have a minimum 15 year period from adoption. -The National Planning Policy Framework (NPPF) preference for a minimum 15 year period from adoption (paragraph 22) is not a mandatory requirement and shorter timescales can be sound, as established in other Local Plan examinations. The Council considers the primary intention of this preference is to ensure plans are forward-thinking; provide a long-term vision, strategy and basis for sound decision making; and do not unduly restrict growth. This is the case in the draft Shropshire Local Plan, with a spatial strategy underpinned by the principle of 'high-growth'. -The National Planning Practice Guidance (NPPG) on Plan Making addresses the plan period at paragraph 64, indicating that the focus is on ensuring that policies are 'forward thinking' and look over a minimum 15 year period. Again, this is the case in the draft Shropshire Local Plan which addresses a 22 year period and has since submission formed a material consideration in decision making. -The proposed plan period continues to align with that of the latter Regulation 18 and Regulation 19 consultations and crucially the submission version of the draft Shropshire Local Plan. -The proposed plan period aligns with the timescales for the proposed 	

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							<p>vision, objectives, policy framework and settlement strategies within the submission version of the draft Shropshire Local Plan.</p> <p>-The proposed plan period supports the continuation of the spatial strategy proposed within the submission version of the draft Shropshire Local Plan - consistent with the proposed retention of the 1,500 dwelling contribution towards the unmet housing need forecast to arise in the Black Country and the continuation of the 'high-growth' principle that underpins the spatial strategy.</p> <p>-This approach is a pragmatic response to the numerous factors that have had implications for the timescales of the plan making process and meant that adoption of the draft Shropshire Local Plan has not occurred when envisaged by the Council - which would have allowed for more than 15 years remaining within the plan period at adoption. In particular:</p> <p>>The Covid 19 pandemic which due to necessary measures to safeguard communities had led to direct delays at key stages in the plan making process; had significant implications on Council resources in order to support the response to the Covid 19 pandemic, leading to delays to the plan making process; and resulted in a specific extension to the timescales for the Regulation 19 consultation.</p> <p>>A number of lengthy and complex objections which required due consideration through the Regulation 19 consultation process and during the ongoing examination processes. This includes a Pre-Action Protocol letter which had a specific implication for the timescales of the examination.</p> <p>-This approach is also a pragmatic approach to avoiding the 'cycle' of examination timescales leading to extensions to plan periods, leading to extension of examination timescales.</p> <p>-This approach is also a pragmatic approach to seeking to positively progress the examination and adoption of the draft Shropshire Local Plan in order to facilitate implementation of the sustainable spatial strategy underpinned by the principle of 'high-growth'.</p> <p>-This approach positively responds to the requirement to review Local Plans every five years.</p> <p>Examples of other circumstances where such an approach has been employed include:</p> <p>-The Hart Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraph 32 of their report (published on 10th February 2020), stating: "There has been some suggestion that the Plan period should be extended. The Plan looks forward 13 years after anticipated adoption, which is below the preferred 15 year time period set out in Paragraph 157 of the NPPF. However, the NPPF's preference is not a set requirement and I consider 13 years to be an appropriate time scale in this instance, particularly as there is now a requirement to review plans every five years." Although the NPPF has been revised since the report, Shropshire Council is of the view that the wording relating to the 15 year time period remain largely unchanged.</p> <p>-The Worthing Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraphs 74-76 of their report (published on 14th October 2022), stating "Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption. As submitted, the Plan period runs from 2020 to 2036. It was anticipated that the Plan would be adopted in 2021 and thus would have met this requirement. The Plan has been prepared during the COVID-19 pandemic, which has had understandable consequences in terms of the preparation and submission of the Plan. This means that the Plan will now be adopted in 2022 and will thus have a lifespan of around</p>	

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							14 years. Although the period will now fall marginally short of the 15 years recommended by the NPPF, I conclude that this does not render it unsound. Delaying the adoption of the plan to address any implications for extending the period would be more likely to frustrate, rather than accelerate the delivery of new housing and employment in Worthing. This would be contrary to the Government's objective of significantly boosting the supply of housing and for Councils to have up-to-date plans in place. On balance, a plan period of up to 2036 would remain broadly consistent with the aims of paragraph 22 of the NPPF in allowing adequate time for the Plan's strategic policies to take effect."	
A142	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General Comments	Not Specified	No	<p>1. Requirements for M4(3) housing are not clear/ambiguous. Need to differentiate between part a) and part b) of M4(3) technical standards. The use of the new hybrid term 'wheelchair user homes' is unclear, making it ineffective and therefore unsound. Although the supporting text recognises this distinction, the policy wording is unclear and should be amended.</p> <p>2. This impact of the proposed policy requirements should have been factored into the whole plan viability assessment. M4(3)a and M4(3)b impact on viability (M4(3)b being considerably more expensive).</p> <p>3. No need for M4(2) requirement, as this issue is already being adequately addressed through Building regulations.</p> <p>4. National guidance sets out circumstances where it is unreasonable to require M4(2) compliant dwellings. The policy wording should reflect this and the need to reflect site specific characteristics.</p> <p>5. The first criterion of the policy is not policy but an explanation of the approach, if retained it should form an introduction not policy.</p> <p>6. Requires all housing specifically designed for older people or those with disabilities to achieve the M4(3) standard. However, it is unclear what housing this is. Is it every bungalow and every block of age restricted apartments?</p> <p>7. If criterion 3 is retained, reference to wheelchair user dwellings should be changed to refer to "wheelchair adaptable homes, unless the Council has nomination rights in which case wheelchair accessible homes can be sought." Similarly, the requirement to meet Building Regulations or higher is ambiguous. Is the requirement to meet Building Regulations or is the policy requirement to go beyond Building Regulations? How would a developer be able to show compliance with this policy when it is unclear what the target is?</p> <p>8. Question how realistic and reasonable it is to require housing to meet both dementia friendly and M4(3)a or b standards. We could wish to see the evidence behind the assertion that the costs of doing both are "minimal".</p> <p>9. Additional flexibility is needed to ensure the requirements in this policy do not inadvertently undermine delivery of much needed open market and affordable housing.</p> <p>10. As the Plan should be read as a whole, there is no need for the policy wording to repeat requirements elsewhere in the plan, as is currently set out in Criterion 19d.</p>	<p>1 and 7. The draft Policy is clear that "On sites of 5 or more dwellings, at least 5% of the dwellings will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations". The explanation to the draft Policy recognises the distinction between M4(3)a and M4(3)b. Shropshire Council considers that this appropriately supports the application of the policy. Reference to achieving higher building regulation standards is in the context of M4(2) provision, recognising over-provision of M4(3) reduces the amount of M4(2) required; the Council consider this is clear and unambiguous.</p> <p>2. To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken. With regard to the optional building regulations accessible and adaptable housing standard for general housing, the proposed standards are specifically considered within the Whole Plan Viability Assessment.</p> <p>3. Whilst Government has consulted on proposed changes to accessibility standard within Building Regulations no timescales have been identified for implementation of the recommendations from this process. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. As such, it is considered appropriate to introduce standard relating to M4(2) provision.</p> <p>4. The draft Policy includes recognition that there may be site-specific factors which mean achievement of M4(2) and M4(3) standards are not achievable.</p> <p>5. Shropshire Council considers criterion 1 of the draft Policy is appropriate. It establishes the need to provide accessible and adaptable housing and appropriate forms of specialist housing and the basis for subsequent policy requirements.</p> <p>6. Shropshire Council acknowledges the requirements of paragraphs 2 and 7 of the draft policy are comparable and as such is proposing a main modification to amend this.</p> <p>8. The explanation to the draft Policy includes reference to the Dementia Friendly Housing Guide which provides guidance on achieving dementia friendly housing. This includes a checklist which addresses layout, decor, lighting, flooring, furnishings, seating, signage, toilets navigation, parking, noise and quiet space. The Council considers that achieving dementia friendly design within M4(3) (where such provision is required) housing is a minimal cost - it is about ensuring these matters and the needs of occupiers with dementia are considered from the outset.</p> <p>9. It is acknowledged that there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such, the Council is proposing a</p>	Yes

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							<p>modification to this draft Policy to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies.</p> <p>Furthermore, consistent with the conclusions of the Whole Plan Viability Assessment a modification is proposed to allow the provision of reduced rates of specialist housing provision where it is demonstrated that this is creating viability concerns for otherwise sustainable schemes.</p> <p>Furthermore, it is recognised that there may be circumstances where a specific site is unsuitable for specialist housing or there is no identified need for such housing in the area; as such the Council proposes a modification to this draft Policy to allow for the provision of reduced rates of specialist housing provision where the Council agrees one or both of these circumstances apply.</p> <p>10. Shropshire Council supports recognition that the draft Shropshire Local Plan is intended to be read and applied as a whole. However, to aid understanding and application of the draft policy it is considered appropriate to cross-reference other policies of particular relevance.</p>	
A142	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General Comments	Not Specified	Not Specified	<ol style="list-style-type: none"> 1. Not commenting on individual sites proposed for allocation, but welcome assessment of additional sites through the new and updated Sustainability Appraisal process. 2. Welcome the clearly set out agreed approach in the SoCG and commitment to deliver 1,500 dwellings to help meet the wider needs of the region. Important the Plan takes forward this commitment through housing and employment allocations - support the conclusion the draft Plan represents a reasonable approach to planning to meet to meet the housing needs of Shropshire and the wider region. 3. Observe that failure to plan for the wider needs of the area would result in leapfrogging of development over the Green Belt resulting in less sustainable patterns of growth. Believe the Council has demonstrated the exceptional circumstances necessary for Green Belt release. 	1-3. Noted.	No
A142	B003	Updated Housing and Employment Topic Paper.	General Comments	Not Specified	Not Specified	<ol style="list-style-type: none"> 1. Welcome extensive duty-to-cooperate discussions with the Black Country Authorities. Recognise the process has noted an unmet housing need is forecast to arise in the Black Country, and Shropshire Council needs to contribute to meeting it. 2. Support continuation of higher housing numbers and need for greenfield and Green Belt site releases to deliver the housing requirement and housing strategy for Shropshire. 	1-2. Noted.	No

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A142	B004	Updated Green Belt Topic Paper.	General Comments	Not Specified	Not Specified	<p>1. Agree exceptional circumstances exist to justify Green Belt release in Shropshire for Shropshire needs and to contribute to the wider housing and employment needs of the region. In the midst of a national housing crisis, this is essential. Support the plan-making process and believe this is the appropriate forum within which Green Belt boundaries should be reviewed.</p> <p>2. Agree the Council has already sought to maximise brownfield land, maximise densities and minimise the need for Green Belt release, as required by the NPPF. Welcome the Councils comprehensive Green Belt Review (although not required by NPPF, it is good practice).</p> <p>3. Support continuation of the high growth and urban focus scenario that underpins the Plan. This includes a minimum contribution 1,500 dwellings and 30ha of employment land towards regional needs. However important to note (as the Council has) that growth in urban areas needs to be complemented by that in rural areas.</p> <p>4. Support the need for safeguarded land as it sets out future direction and enables the next phase of development in Shropshire to ensure that economic and housing growth continued beyond the plan period.</p> <p>5. Note the conclusions of the paper regarding Green Belt release. In light of the housing crisis, would support a higher housing requirement and more Green Belt release, to ensure housing needs of Shropshire and the wider West Midlands region can be met in full.</p>	<p>1-4. Noted.</p> <p>5. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable. The proposed housing requirement has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also provides some flexibility to respond to changes to LHN over the plan period, includes a contribution of 1,500 dwellings to unmet cross-boundary need arising within the Black Country, and an opportunity to respond/support other objectives, as identified with the Explanation of draft Policy SP2.</p>	No
A143	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.3, 12.4 Appendix 3	Not Specified	Not Specified	<p>1. The Draft Local Plan meets our future needs in a planned and manageable way.</p> <p>2. Encroachment into the Green Belt would impact the whole village, the community, local health provision and traffic flow.</p> <p>3. The draft and local plan provides for planned and manageable growth.</p>	<p>1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A144	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.3 & 12.4 Appendix 3	Yes	Yes	<p>1. Fully support the Local Plan, which can fulfil needs without overdevelopment and taking Green Belt land which is designated for a reason.</p> <p>2. The local plan makes provision for over 770 homes which is more than adequate.</p>	<p>1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A145	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, 12.4, 4.14 - 4.21, 5.24-5.27, 6.4-6.8	Yes	Yes	<p>1. There is a recognised need for additional housing and Albrighton has plans for approximately 700 homes, which would make a healthy sustainable housing supply for the village.</p> <p>2. Agree with the local plan that new housing should be built in three allocation sites - Tasley, Shrewsbury and Ironbridge Power Station.</p> <p>3. Further developments in Albrighton should be phased so Albrighton is not overwhelmed and does not lose its character.</p>	<p>1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A146	B001	Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8	Yes	Yes	<p>1. Do not feel further incursion into the Green Belt is needed.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A147	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.3, 12.4, Appendix 3	Yes	Yes	<p>1. Fully support Shropshire's Local Plan.</p> <p>2. The planned sites ALB017 & ALB021 have been chosen to minimise any negative affect on the village whilst taking into consideration its current size and infrastructure.</p> <p>3. Shropshire Council have already assessed sites P36A and P38B and deemed them unsuitable for development for several reasons which I agree.</p>	<p>1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A147	B002	Updated Housing and Employment Topic Paper.	Paragraphs 7.63, 7.64, 8.7-8.88 and 16.64 Table 8.1 and 8.3	Yes	Yes	<p>1. Steady growth proposed by ALB017 & ALB021 is appropriate rather than rapid development.</p> <p>2. Green Belt and open countryside is conducive to healthy living and both mental and physical well-being. Farmland should be protected to safeguard future food production needs.</p> <p>3. The Council recognise that Albrighton is not a suitable location for large employment buildings, especially on its Green Belt. Development such as this should be built close to large populations, preferably on brownfields sites, thereby minimising the need for the workforce to travel.</p>	<p>1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

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A147	B003	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.24-5.27, 6.4 - 6.8 and 6.13	Yes	Yes	<p>1. The three sites in Tasley, Shrewsbury and Former Ironbridge Power station has been identified to meet the Black Country housing need and so no Green Belt land (outside of this plan) should be allowed to be developed.</p> <p>2. Albrighton will have safeguarded land for housing after 2038, this is an acceptable plan for future housing needs.</p> <p>3. Pleased Shropshire Council recognises the need to preserve the Green Belt around Albrighton.</p> <p>4. Albrighton is not the right place to accommodate development in order to fulfil the Black Country housing requirements and therefore I full support the Shropshire Local Plan.</p>	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A148	B001	Updated Green Belt Topic Paper.	Paragraphs 4.1-4.21, 5.23-5.27, 6.4-6.8 and 6.13	Yes	Yes	<p>1. The Local Plan gives protection to the Green Belt areas in Albrighton.</p> <p>2. Agree there should be 3 sites safeguarded from development in Albrighton so they are kept clear to be built on after 2028 as previously agreed.</p>	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A149	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3 and Table 12.4 Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Appendix 3 Updated stage 3 Site Assessment. Paragraphs 7.63, 7.64, 8.7, 8.8 and 16.64-76.65 and Tables 8.1 and 8.3 Updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27 and 6.4-6.8 and 6.13 Updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the Shropshire Local Plan which allows for gradual growth of the housing stock while at the same time protecting the local Green Belt.</p> <p>2. The Plan would allow those amenities to grow organically in response to greater demand.</p>	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A150	B001	Updated Housing and Employment Topic Paper.	Paragraph 7.61	Yes	No	<p>1. Updated Housing and Employment Topic Paper provides significant additional evidence in support of the proposed housing requirement and uplift in housing provision is supported. However, unclear how uplift scale derived and do not agree with magnitude of uplift derived & as previously identified by the Plan Inspectors it is considered that the housing requirement is based on meeting Shropshire needs but does not include additional contribution to Black Country housing needs. Housing requirement should therefore be +1500, therefore in region of 32,800 dwellings or 1,491 dwellings per annum.</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p>	No

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A150	B002	Updated Housing and Employment Topic Paper.	Paragraph 9.10	Yes	No	<p>1. Sites identified to meet contribution to Black Country needs are proposed allocations which were already included within the submission version Plan. Therefore, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Thus, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire.</p> <p>2. There are sites appropriate to meet local needs associated within higher-tier settlements, in line with the proposed spatial strategy. These would make an appropriate contribution to meeting an uplift in the overall dwelling requirement and offset the loss of sites specifically identified to meet the needs of the Black Country. One example is OSW017 detailed at Regulation 19.</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate. It should be noted that the submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan.</p> <p>2. Shropshire Council considers the proposed development strategy for Oswestry appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at Oswestry have been informed by a proportionate and robust site assessment process.</p>	No
A150	B003	Updated Housing and Employment Topic Paper.	Paragraphs 8.65-8.66	Yes	No	<p>1. There is a finite and diminishing supply of brownfield land and windfall sites within settlements. Development capacity of both allocated and windfall sites also significantly impacted by recent policy changes in particular the need to provide Biodiversity Net Gain on new developments. The preferred option of Increasing Settlement Guidelines and Windfall Allowances (in three settlements) for accommodating an uplift in the dwelling requirement & meeting the minimum housing requirement is not deliverable or appropriate & in conflict with NPPF .</p> <p>2. In addition, in not allocating land for development, question whether the Plan makes appropriate provision for specific housing requirements such as: 'self' builds, affordable housing, housing for older people/those with disabilities and special needs provision of which is predominantly through percentage contributions on allocated sites. As windfall sites tend to be smaller they are less likely to trigger requirements for provision of e.g. affordable housing. Additionally provision on brownfield sites may be 'reduced by a proportionate amount' (NPPF, paragraph 65).</p> <p>3. Given 1 & 2 , Option 3, increasing site allocations, should therefore be adopted to ensure that the Plan is justified, deliverable and effective.</p>	<p>1. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p> <p>1-3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No

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A150	B004	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 10.51-10.52	Yes	No	<p>1.The finite and diminishing supply of brownfield land and windfall sites within settlements coupled with recent policy changes, including Biodiversity Net Gain requirements on new developments, will have a significant impact upon the capacity of all housing sites.</p> <p>2. Further, in not allocating land for development, it is difficult to determine whether the Plan makes appropriate provision for those with specific housing requirements such as those requiring affordable housing, housing designed for older people or those with disabilities and special needs, or those who wish to build or commission their own homes. Such provision is predominantly sought through percentage contributions on allocated sites. Windfall sites tend to be smaller and less likely to trigger requirements for provision such as affordable housing, whilst provision on brownfield sites may be 'reduced by a proportionate amount' (NPPF, paragraph 65).</p> <p>3. As a consequence of 1 & 2 above consider that preferred option of 'accommodating the proposed uplift in housing requirement by increasing settlement guidelines and windfall allowances' is not likely to result in a strongly positive effect on SA objective 3: provision of a sufficient amount of good quality housing. Therefore, disagrees with the conclusions of the Updated Additional Sustainability Appraisal in paragraph 10.51, that none of the reasonable options identified for accommodating the uplift to the proposed housing requirement are likely to result in a strongly negative effect & paragraph 10.52 in respect of likely strongly positive effect on SA objective 3 .</p> <p>4. Increasing site allocations provides far more certainty in respect of SA objective 3 and should be reassessed accordingly.</p>	<p>1. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p> <p>1-4. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>3 & 4. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.</p>	No
A150	B005	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.82-12.87	Yes	No	<p>1. The assessment of sites to accommodate proposed contributions to the Black Country considered all sites in the relevant assessment geography. As recognised in paragraph 12.84 of the additional Sustainability Appraisal (SA) it is not surprising sites identified for this purpose are proposed allocations. However, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Therefore, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire.</p> <p>2. There are sites appropriate to meet local needs outside the identified assessment geography associated with higher-tier settlements which would offset the loss of any sites specifically identified to meet the needs of the Black Country, whilst also meeting settlement specific housing requirements. One example is OSW017 (detailed at regulation 19).</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p> <p>2. Shropshire Council considers the proposed development strategy for Oswestry appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at Oswestry have been informed by a proportionate and robust site assessment process.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A150	B006	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 6.8	Yes	No	<p>1. Disagree that that option 1, making no contribution to the unmet needs of the Black Country, is a 'reasonable' option. Option 1 would conflict with the NPPF paragraph 11 presumption in favour of sustainable development particularly in respect of part b) providing for any needs that cannot be met within neighbouring areas.</p> <p>2. Regulation 19 response set out reasons why there will continue to be a significant shortfall of land to meet the Black Country's housing needs even in the light of the proposed Shropshire and other local authority contributions. Whilst work relating West Midlands evidence update is ongoing, there is a known shortfall, with a reduced contribution (from 2022) in South Staffordshire's 2024 publication version Plan. The same Plan also sets out the level of West Midlands and Birmingham shortfall which is considered likely to increase.</p> <p>3. Given 1 & 2 an uplift in Shropshire's contribution towards the housing needs of the Black Country (above that proposed in Option 2), rather than Option 1's no contribution would be more reasonable.</p>	1-3 Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.	No
A150	B007	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 8.6	Yes	No	<p>1. Support the conclusion that a 'high-growth' strategy is the most sustainable. However, it is unclear why this is based on the 2020 assessment of Local Housing Need with an overlap between the uplift and proposed contribution to the Black Country. Consider this option should be 1,500 dwellings above the submission version of the draft Shropshire Local Plan - 32,800 dwellings or 1,491 dwellings per annum.</p>	<p>1. Shropshire Council considers the additional Sustainability Appraisal (SA) assessment assessed the reasonable options for the proposed housing requirement. These methodology for identifying these options is explained within the additional SA. In summary they are considered consistent with those considered within earlier stages of the SA process and positively respond to the guidance provided by the Inspectors in ID37.</p> <p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p>	No
A151	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1 - 12.3, 12.4 & Appendix 3; Updated Stage 3 Site Assessment of the Additional Sustainability Appraisal Paragraphs 7.63, 7.64, Tables 8.1 & 8.3, 8.7 - 8.8, 16.64 - 16.65 of the Updated Housing and Employment Topic Paper Paragraphs 4.14 - 4.21, 5.23 – 5.27, 6.4 – 6.8, 6.13 of the Updated Green Belt Topic Paper	Yes	Yes	<p>1.The Local Plan supports the protection of the attractive rural village of Albrighton and its greenbelt. Shropshire Council have considered the need for housing and reviewed the sites available in Shropshire (12.1-12.3) with 2 sites in Albrighton identified (12.4) No other sites should be made available and Green Belt land and environment protected thus addressing housing need in a controlled way without turning the village into a town. Other sites proposed by developers in Green Belt should be rejected.</p> <p>2.Additional Sustainability Appraisal report Appendix 3. Updated stage 3 site assessment - does not support development of P36A and P36B which should be retained as Green Belt land for current & future benefit. There are other sites more suitable for housing without environmental impact and destroying green belt.</p> <p>3.Shropshire Local Plan – Housing and Employment Topic Paper (7.63 and 7.64) - agree a need for extra housing but only that which is well planned, environmentally compatible and outside green belt. Identified sites ALB017 and ALB021 need to be steadily built to minimise impact on the village.</p> <p>4.Green Belt should not be built on to meet Black Country housing needs, other options available.</p> <p>5.Any large buildings for employment should not be within the village.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A152	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Whole document	Yes	Yes	1.Green Belt is important for wellbeing of existing community & future generations, any loss of which is permanent. 2. Fully support the amended local plan which addresses additional housing and business use whilst not taking additional Green Belt for development. Rural England's character must be safe guarded with gradual growth as indicated within the revised plan.	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A153	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	whole document including Updated Green Belt Topic Paper, paragraphs 5.9, 5.15.	Yes	No	1. The first set of key issues show how the Sustainability Appraisal and Topic Papers do not address the Inspectors issues by effectively re-appraising the Council's position. The Council should have re-considered the need to safeguard land from the Green belt, the need for additional employment land for Black Country unmet need, the necessity to locate this land in Shifnal, the opportunities for windfall development and densification of other proposed allocations, to locate this development outside the Green Belt or on Green Belt land that would cause less harm to the Green Belt from the release of alternative sites: 2. Planning Inspectors are asked to consider the legal compliance of undertaking the Updated Additional Sustainability Assessment in 2024 in order to assess the Shifnal employment site which was allocated in the Draft Local Plan in 2021. 3. The Council have not overcome the Issues identified in their Hearing Statements on Matter 1 - Legal Compliance/Procedural Requirements in 2022 and 2023, Matter 2 - Duty to Co-operate in 2022 and 2023, Matter 3 - Development Strategy, Matter 4 - Housing and Employment Need in 2022 and 2023, Matter 6 - Green Belt and Matter 7 - Strategic Settlements and this Additional Consultation Response supplements these earlier submissions on these Matters. 4. The suggestion to accommodate the additional 20ha on windfall sites does not make the Draft Local Plan sound, subject to approving the provision of 39ha in Shifnal to meet unmet Black Country need. The Inspectors must give further consideration to: - whether Shifnal which is just a key Centre is an appropriate location for a large 39ha employment allocation; - whether the Black Country require 39ha of employment land to meet unmet need of just 30ha; - whether the Black Country need this large allocation or whether provision may be made through windfall development or densification of other proposed employment allocations. - whether these other delivery options should also target more strategic locations including Shrewsbury, other Principal Centres and Ironbridge Strategic Settlement (see para 16.52) and Madeley in Telford where developer contributions may provide the necessary infrastructure as is currently proposed in Shifnal; - whether employment land for the Black Country should be located in the same sustainable Principal centres see paras 16.14-16.48) as the Black Country housing provision;; - whether the assumption that advanced infrastructure provision in Shifnal is not required to accommodate the 39ha employment	1. Noted. 2. Noted. 3. Noted. 4. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement. 5. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs. 6. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper. 7. Shropshire Council considers the proposed mechanism to accommodate the uplift to the employment land requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by the	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						<p>allocation is viable and sustainable.</p> <p>5. The Council should show how the Black Country unmet needs can be proven following the demise of the Association of Black Country Authorities which challenges the duty to co-operate agreements and the Statement of Common Ground and the Inspector is invited to consider whether a proven unmet need currently exists</p> <p>6. The process of assessing the contribution towards unmet employment land needs in the Black Country is not sound. The assessment should have considered the relative merits of a number of locations in Shropshire including Shifnal, Telford, M54 Junction 2 and M6 Junction 12. This assessment should have considered the accessibility and infrastructure at these locations which would have shown that Shifnal is not an appropriate and sustainable location for the type and scale of development proposed.</p> <p>7. The Housing and Employment Topic Paper should not simply focus on Option 3 (site allocations) to accommodate the 30ha of employment land to contribute towards unmet employment land need in the Black Country but should also explore Option 1 - windfall employment development, and Option 2 - densification of proposed employment allocations (see para 15.37). For these reasons, it is unclear why Option 4 - a combination of one or more options, has not been explored in more detail (see para 15.46).</p> <p>8. The Green Belt Topic Paper focuses on the justification for releasing the 39ha employment allocation in Shifnal even though it recognises the need to consider alternative development options / locations (paragraph 5.9) and the need to provide full evidence and justification for releasing Green Belt land (paragraph 5.15).</p> <p>9. The Council should have located the proposed employment allocation outside the Green Belt in Madeley within Telford, Shrewsbury, Bridgnorth or Ironbridge together with their proposed residential allocations where the enhanced transport hubs in these settlement could encourage sustainable transport choices.</p> <p>10. In the process of assessing the contribution towards unmet employment land needs in the Black Country, a range of options should have been considered in Shifnal including different types of development i.e. brownfield sites in Shifnal [and RAF Cosford] and the choice of locations in/around Shifnal including existing safeguarded land. The Council need to identify the range of sites considered in Shifnal to deliver this proposed 39ha employment allocation.</p> <p>11. Draft Local Plan proposes that Shifnal should accommodate 39ha of employment land and 82.4ha of land safeguarded from the Green Belt but the infrastructure requirements, delivery timescale and funding responsibilities for Shifnal have not been identified in the Council's submitted documents or its evidence base including GC48 - Shropshire Annual Infrastructure Funding Statement (December 2023).</p>	<p>planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>8. - 11. Shropshire Council considers that the proposed development strategy for Shifnal is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p>	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A153	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	whole document including Updated Green Belt Topic Paper, paragraphs 5.9, 5.15.	Yes	No	<p>1. The second set of issues show how the information presented is flawed and confusing where 30ha of unmet employment land need are met on 39ha or 41ha of allocated land. This seeks to meet a need identified by ABCA that no longer exist and cannot justify or confirm this unmet need. Further there is a sufficient supply with a significant additional buffer to meet the proposed employment land requirement.</p> <p>2. The Housing and Employment Topic Paper should set out the evidence showing how windfall employment development can accommodate the additional 20ha uplift on the employment land requirement to support para 15.34. Further to this: - a supply of 413ha of employment land appears sufficient to meet an employment requirement of 320ha with a 30ha contribution towards unmet employment land need in the Black Country. Unfortunately, it is unclear why there is an additional buffer of 93ha and why this buffer is both 35% of the employment land requirement (in para 17.6) but only 30% (in para 18.1).</p> <p>3. The Updated Additional Sustainability Appraisal should have assessed the choice of safeguarded land to be removed from the Green Belt around Shifnal. This assessment should also have considered whether the decision to safeguard land from the Green Belt in Shropshire was sustainable when the Council has demonstrated an adequate supply of land for development in Shropshire for the period to 2038.</p> <p>4. The Green Belt Topic Paper should justify removing 121.4ha of land from the Green Belt to be safeguarded for future development.</p>	<p>1. Noted.</p> <p>2. The Updated Additional Housing and Employment Topic Paper (GC) discusses the employment land supply and explores the flexibility to respond to changing circumstances through the Plan period to 2038. The employment land supply of 413ha would provide a the buffer of 93ha above the 320ha employment requirement (not in addition to the 413ha supply) and this buffer will ensure there is sufficient capacity with in the employment land supply to meet the strategic objectives of the Plan.</p> <p>3. & 4. Shropshire Council considers that the proposed development strategy for Shifnal is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p>	No
A154	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 6.4-6.8, 7.63-7.64, and 12.1-12.4	Yes	Yes	<p>1. Fully support the Local Plan as it stands. Pleased to see that the Plan has given consideration to retention of Green Belt around Albrighton, which has beautiful and peaceful routes for recreation, alongside future housing needs without compromising the local character or overdevelopment of the close community.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A155	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Table 12.4 and Appendix 3	Yes	Yes	<p>1. 12.4 Appendix 3. Strongly object to any housing development on Green Belt. Green Belt provides quiet & beautiful rural setting around Albrighton the natural environment of which is enjoyed. Village community and adjacent Conservation area and listed buildings all need protecting for existing and future generations.</p> <p>2. Table 12.4 Agree with planned housing on sites ALB017 & 21 to meet future needs. Future development should not be to meet Black Country needs or on Green Belt</p> <p>3. Appendix 3, sites P36a & P36b proposed for development by Boningale Homes are unsuitable for development due to environmental & health impacts associated with traffic increase. Also distant from village amenities requiring use and parking of vehicles for access.</p>	<p>1-3 Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A155	B002	Updated Green Belt Topic Paper.	paragraphs 6.4-6.8, 6.13	Yes	Yes	<p>1. 6.4-6.8 Green Belt countryside around Albrighton should be maintained for future generations & not be developed, particularly not P36a & B as proposed by Boningale Homes.</p> <p>2. Agree with new housing on ALB017 & 21 but must be phased.</p> <p>3. 6.13 there are more suitable sites than Albrighton to meet Black Country Housing needs</p>	<p>1-3 Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A155	B003	Updated Housing and Employment Topic Paper.	Paragraphs 7.63 & 7.64, 8.7 & 8.8	Yes	Yes	1. 7.63 & 7.64 protect Green Belt for future. Any development proposals should be rejected. 2. 8.7 & 8.8 Green belt should not be built on as impacts on countryside, its recreational and wellbeing benefits and its biodiversity. Significant traffic generation associated with development a hazard. Trees & hedgerows should be protected from lane widening to accommodate traffic.	1-2 Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A156	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.3, 12.4	Yes	Yes	1. Supports the Shropshire plan, has been public consultation on development sites 2. Sufficient sites in Albrighton have been designated for development, no other sites, particularly green belt required. 3. Strong objection to Boningale Homes development proposal on green belt. Would increase village size by 62%, lack of infrastructure to support and negative impact on valued local character.	1-3 Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A156	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 4.14-4.21, 5.24 -5.27, 6.4-6.8, 6.13.	Yes	Yes	1. Agree that new housing should be phased to allow assimilation of development and retention of village character. 2. Identified sites Tasley, Shrewsbury and the former Ironbridge Power Station and Albrighton provide for housing. Albrighton Green Belt should be protected for well-being of residents, to maintain biodiversity and farmland.	1-2 Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A157	B001	Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8	Yes	Yes	1. Supports Local Plan. Interest in countryside & gardening & concerned about loss of any Green Belt & Farmland.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A158	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Not specified	Yes	Yes	1. Support the local plan. It provides for sufficient development to meet need and protects Green Belt, historic environment and farms. Green belt should not be developed.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A159	B001	Updated Green Belt Topic Paper.	Paragraphs 5.24 - 5.27, 6.4-6.8, 6.13.	Yes	Yes	1. Support the local plan. Green belt around Albrighton should be retained in perpetuity & not be developed. Rural characteristics of Albrighton area are important, supports diverse wildlife and countryside is easily accessible.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A160	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.4, and 4.14-4.21	Yes	Yes	1. Support the draft Shropshire Local Plan and agree the best sites for accommodating contributions to the Black Country are at Tasley, Shrewsbury and the former Ironbridge Power Station. No further Green Belt should be released at Albrighton.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A161	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 12.4, 4.14-4.21 and 6.4-6.8	Yes	Yes	1. Appendix 3 of the additional Sustainability Appraisal (SA) states sites P36A and P36B would create serious traffic problems on the A464 and should be retained as Green Belt to protect the environment. 2. Paragraphs 4.14-4.21 of the Green Belt Topic Paper illustrates the Council is clear where new housing should be developed at Albrighton and other sites should not be developed. 3. Paragraphs 6.4-6.8 of the Green Belt Topic Paper specify the importance of Green Belt at Albrighton. 4. Support the draft Shropshire Local Plan as it provides control over planning/housing decisions to prevent over-development; protection of the environment/Green Belt (important farming land); and provides for current housing needs.	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A162	B001	General comment	General comment	Yes	Yes	1. Support the draft Shropshire Local Plan housing proposed for Albrighton to 2038.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A163	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8, 12.1-12.3 and 12.4	Yes	Yes	1. Albrighton has a range of facilities which make daily life convenient, the layout is easy to get around and the countryside surrounding Albrighton is beautiful.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A164	B001	Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8	Yes	Yes	1. Albrighton's Green Spaces are essential for a continued healthy and sustainable way of life for all residents in the village and for future generations to enjoy. 2. Don't want unnecessary development and large urban sprawl come to our village. 3. The setting, environment and special character of Albrighton should be protected for no and future generations.	1 - 3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A165	B001	Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8	Yes	Yes	1. Do not support development that will change Albrighton with increased traffic and strain on existing resources.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A166	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1 - 12.3 Table 12.4 Appendix 3 - Updated Stage 3 Site Assessment	Yes	Yes	1. Agree with the locations of the sites identified in Shropshire for the Black Country housing need as they do not appear to have a detrimental impact on their respective local communities. 2. ALB017 & ALB021 are well located as to not have a negative effect on the fabric of the village and are proportionate to the village size and infrastructure. The location on the edge of the village nearest to the A41 means the increased in traffic should not impact on the high street. 3. The land safeguarded for beyond 2038 is reasonable. 4. The Green Belt and important agricultural land should not be built on when there are more suitable and sustainable sites available.	1 - 4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A166	B002	Updated Housing and Employment Topic Paper.	Paragraphs 7.63-7.64, 8.7-8.8 and 16.64 Table 8.1	Yes	Yes	1. Any building on green fields or Green Belt which is not included in the Local Plan should be rejected. 2. Wholly oppose any building including large commercial developments in green spaces and on Green Belt surrounding the village as these often only supply short-term employment.	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A166	B003	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.24-5.27, 6.4-6.8 and 6.13	Yes	Yes	1. Shropshire Council have been sensitive to the preservation and protection of the surrounding Green Belt. 2. Shropshire Council are approaching current and long-term development in a measured way and demonstrates Shropshire Council understand the settlement is not just a village but a community. This character would be irreparably diluted and destroyed by overdevelopment. 3. Shropshire Council recognise that building on Albrighton's Green Belt would not only be detrimental to the environment and agriculture but to the health and well being of its residents. 4. I hope the Draft Shropshire Local Plan, which I fully support is approved.	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A167	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Table 12.4	Yes	Yes	1. Existing plans for housing in Albrighton are more than enough for steady growth of the village anything else is over the top of any natural growth of the village.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A168	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 16.64 of the Updated Housing and Employment Topic Paper. Paragraphs 6.4-6.8 of the Updated Green Belt Topic Paper.	Yes	Yes	1. Fully support the draft Shropshire Local Plan as it offers controlled growth that maintains the character of Albrighton. 2. Green Belt is vital for wildlife/habitats, access to space for recreation/mental health benefits/nature connection, to avoid urban sprawl, and contributing to addressing the climate emergency. 3. Employment provision is important, but not at the expense of nature. There is ample access via public/private transport links to Shrewsbury, Telford and Birmingham.	1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A169	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraph 12.4 of the Additional Sustainability Appraisal Paragraphs 6.13 and 5.24-5.27 of the Updated Green Belt Topic Paper.	Yes	Yes	1. Support the draft Shropshire Local Plan. Appreciate the need for housing at a slow pace, but not at the expense of village life. The green areas surrounding Albrighton need to be protected for future generations, mental health, safety, amenity space etc.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A170	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8, 6.13, 7.63-7.64 and 12.4	Yes	Yes	1. Reassured by the draft Shropshire Local Plan. It addresses the need for housing to 2038 and is mindful of not using Green Belt land, which must be protected. 2. There is land in other locations more suitable to accommodate proposed contributions to the Black Country.	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A171	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8 and 12.4	Yes	Yes	1. Understand the benefit of the gradual introduction of a limited number of additional homes. Rapid growth would destroy the community and have a negative impact on the GP, schools and parking.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A172	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8 and 12.4	Yes	Yes	1. Support the draft Shropshire Local Plan. Understand the benefit of the gradual housing growth. Rapid growth would destroy the community and negatively affect local services. Also oppose development in the Green Belt/agricultural land.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A173	B001	Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 8.7-8.8 and Table 8.3 of the Updated Housing and Employment Topic Paper. Paragraphs 5.24-5.27 and 6.4-6.8 of the Updated Green Belt Topic Paper.	Yes	Yes	1. Support the draft Shropshire Local Plan. It ensures control over housing and planning decisions in Albrighton; provides robust protection of the Green Belt (important for farming, character of the village, and environmental sustainability - essential due to the climate emergency). Sites not in the plan should be refused.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A174	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.4 of the Additional Sustainability Appraisal. Paragraphs 8.7-8.8 and 7.63-7.64 of the Updated Housing and Employment Topic Paper. Paragraphs 6.4-6.8 of the Updated Green Belt Topic Paper.	Yes	Yes	1. There are more appropriate locations than Albrighton to accommodate proposed contributions to the Black Country (i.e. Tasley, Shrewsbury and Ironbridge Power Station). 2. There are two sites proposed to be allocated at Albrighton. Housing needs to be well planned. No others are required (particularly in the Green Belt which protects the character of the village, wildlife and local farming). 3. Support the proposed 500 dwelling increase to the housing requirement.	1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A175	B001	Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Table 8.3 of the Updated Housing and Employment Topic Paper. Paragraphs 5.24-5.27 and 6.4-6.8 of the Updated Green Belt Topic Paper.	Yes	Yes	1. Proposed allocations ALB017&ALB021 allow for controlled growth (see Table 8.3). Further development would risk losing the Green Belt of the village which would create sprawl and loss of character.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A176	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8, 6.13 and 12.1-12.4.	Yes	Yes	1. Unfettered development is unsustainable - impact on air quality and congestion. There are enough brownfield sites to satisfy housing need without the need for Green Belt. Particularly concerned about Shaw Lane, Albrighton which already has on-street parking for housing and the railway station.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A177	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	Paragraphs 6.4-6.8, 7.63-7.64 and 12.4	Yes	Yes	1. Support the draft Shropshire Local Plan as Green Belt should not be built on.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A178	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.4	Yes	Yes	1. Support the draft Shropshire Local Plan as understand the need for some housing. 2. Contributions to the Black Country are best accommodated at Tasley, Shrewsbury and Ironbridge Power Station.	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A179	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8, 7.63-7.64, 12.1-13.3 and 12.4	Yes	Yes	1. Support the draft Shropshire Local Plan as it has been informed by community engagement, considers local needs, controls development and is consistent with national policy. Not opposed to development, it just needs to be well planned. 2. Sites at Shrewsbury, Tasley and Ironbridge Power Station are best placed to accommodate contributions to the Black Country. There is no need for housing in Albrighton, particularly in the Green Belt. 3. Sites P36A and P36B should not be developed. Development proposals in the Green Belt should be refused. there are already proposed for over 500 dwellings at the village.	1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A180	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.24 and 6.4-6.8	Yes	Yes	1. Agree with the sites identified in paragraphs 4.14-4.24 of the Green Belt Topic Paper, these sites are more appropriate than development on farmland. 2. the Green Belt around Albrighton is vital to the community as it supports mental and physical health and wellbeing.	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A181	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8 and 8.7-8.8	Yes	Yes	1. Proposals in the draft Shropshire Local Plan are sensible and well thought out. Current development is accessible to roads and services and development at ALB017&ALB021 is sufficient for the area. Development should be consistent with this plan - concerned other development proposals at the village is unsustainable, there is insufficient infrastructure (particularly roads and drainage), flood risk, would constitute over-development, would destroy the character of the village and result in loss of countryside (productive farmland which feeds the nation). 2. Contest the need to provide housing for the Black Country, preference of residents of the Black Country is to live there. They will have to commute to work/see friends and family, increasing congestion on roads.	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A182	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8 and 8.7-8.8	Yes	Yes	1. Proposals in the draft Shropshire Local Plan are sensible and well thought out. Current development is accessible to roads and services and development at ALB017&ALB021 is sufficient for the area. Development should be consistent with this plan - concerned other development proposals at the village is unsustainable, there is insufficient infrastructure (particularly roads and drainage), flood risk, would constitute over-development, would destroy the character of the village and result in loss of countryside (productive farmland which feeds the nation). 2. Contest the need to provide housing for the Black Country, preference of residents of the Black Country is to live there. They will have to commute to work/see friends and family, increasing congestion on roads.	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A183	B001	Updated Housing and Employment Topic Paper.	Paragraphs 7.63-7.64 and 16.64-16.65	Yes	Yes	1. Paragraphs 16.64 and 16.65 highlight the importance of recognizing Albrighton's unique constraints and safeguarding its Green Belt. These considerations are crucial in maintaining the village's character and preventing unsustainable growth. Albrighton's designation as a Key Centre (while functionally a larger village), underscores the need for careful development planning. Constraints related to its conservation areas, proximity to RAF Cosford, and barriers created by the A41/railway line must be respected. Any increase in housing must not compromise these vital aspects that define Albrighton. Appreciate recognition of Albrighton's limited capacity for significant new development.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A183	B002	Updated Green Belt Topic Paper.	Paragraphs 5.4, 5.23-5.27, 6.5-6.6, 6.12 and 7.1 and Table 4.1	Yes	Yes	<p>1. Shropshire Council has effectively responded to the Planning Inspector's requirement to provide evidence for the assessment and allocation of 1,500 dwellings needed for the unmet Black Country requirement, as outlined in Table 4.1. Pleased no additional Green Belt land has been designated for these dwellings.</p> <p>2. Support paragraph 5.4, no exceptional circumstances exist to justify removal of RAF Cosford from the Green Belt. Shropshire Council has clearly considered alternative locations for future housing needs and identified site allocations in Albrighton that safeguard existing Green Belt land.</p> <p>3. Strongly agree with paragraphs 5.23-5.27 and 6.5. Would prefer no land be removed from the Green Belt, but agree some safeguarded land, such as ALB017 and ALB021 in Albrighton, should be removed from the Green Belt for future development. This land should only be developed once allocated within a future Local Plan to meet Shropshire's housing needs.</p> <p>4. Endorse paragraph 6.6, no further land should be removed from the Green Belt in Albrighton. The three safeguarded areas identified provide for Albrighton's growth beyond the plan period. Speculative development on other Green Belt (which should be protected) at Albrighton is unacceptable.</p> <p>5. Paragraphs 6.12 and 7.1 highlight other locations are better suited than Albrighton to accommodate contributions to the Black Country. Any future speculative development in Albrighton for this purpose should be refused and the draft Shropshire Local Plan upheld, especially since the only other viable land has already been safeguarded.</p> <p>6. Careful consideration has been given to provide for sustainable future growth of Albrighton, whilst ensuring the Green Belt boundary remains unchanged at the end of the plan period. Green Belt must be protected (it controls urban sprawl, protects village boundaries, maintains green spaces, protects ecosystems, supports agriculture, and it safeguards historical and unique character of our rural community).</p>	1-6. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A184	B001	General comment	General comments	Yes	Yes	1. Support the draft Shropshire Local Plan - do not support development in the Green Belt, which is contrary to the need to grow local food.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A185	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65 and Tables 8.1 and 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it has been informed by community engagement, is consistent with national policy, has been informed by engagement with the wider West Midlands, and clearly defines locations for development ensuring housing needs are met to 2038 and beyond, whilst maintaining control of the locations and densities of development and protecting the Green Belt.</p> <p>2. With regard to paragraphs 12.1-12.3 and Table 4 of the additional Sustainability Appraisal (SA); paragraphs 7.63-7.64 and 8.7-8.8 and Tables 8.1 and 8.3 of the Housing & Employment Topic Paper; and paragraphs 4.14-4.21, 5.24-5.27 and 6.4-6.8 of the Green Belt Topic Paper; the Council has proposed 500 dwellings in Albrighton over the plan period and assessed sites and identified proposed allocations to meet this without impacting on the character and environment of the village (development of proposed allocations should be built steadily over 10 years and then less development to 2038). Consider there is no requirement for large employment sites at the village. Agree land should be 3 areas safeguarded for development after 2038. No others are required - particularly in the Green Belt.</p> <p>3. Appendix 3 of the additional SA demonstrates sites P36A and P36B have been assessed and it was determined they are not appropriate for development - alternative non-Green Belt sites available, should be retained as fields/Green Belt, proximity to listed buildings and a conservation area, and lack of sufficient infrastructure/traffic impact.</p> <p>4. Agree contributions to unmet housing needs of the Black Country should be accommodated in Tasley, Shrewsbury and the former Ironbridge Power Station. As per paragraph 6.13 of the Green Belt Topic Paper, Albrighton is not the right place to accommodate these contributions, and there are better sites elsewhere.</p> <p>5. Protection of Green Belt at Albrighton is essential for farming areas, the character of the village, natural surrounding landscapes and the environment and protection against climate change.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A186	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	Not specified	Not Specified	Not Specified	<p>1. Notes process set out to arrive at a housing requirement of 31,300 dwellings 2016-2038, including a 500 dwelling uplift and a contribution of 1,500-dwellings towards the unmet need in the Black Country.</p> <p>2. Notes identified options for meeting 500 dwelling uplift in updated SA and conclusion that Option 1 was the most sustainable option with adjustments to settlement guidelines and windfall allowance only in Shrewsbury, Whitchurch and the Former Ironbridge Power Station proposed. However, consider that it would be more appropriate to pursue an option that spreads housing distribution more evenly in sustainable settlements across the county and intensification of existing draft allocations. Therefore, consider Option 2 'Densification of Proposed Site Allocations' which would meet need across the county more suitable.</p> <p>3. The proposed Hodnet allocation (HHH001 & HHH014) for 40 dwellings is deliverable. However, as the density is circa 13/14 dwellings per hectare additional densification on this allocation possible, without affecting viability & delivery, to improve its contribution to the increased housing requirement.</p> <p>4. Notes the Inspectors' Interim Findings that any proposed contribution to the Black Country's unmet housing need would need to be provided on specific site(s) and the process undertaken by the Council for identifying reasonable sites to accommodate the 1500 dwelling contribution. However, consider inappropriate to identify only 3 sites (BRD030, SHR060, SHR158 & SHR161 & IRN001) out of 450 considered to meet the necessary geographical requirements. Increasing number dwellings on already large sites has potential to slow dwelling delivery. Would be more deliverable (with faster delivery) to accommodate unmet need across numerous sites in sustainable settlements and through the intensification of several existing draft allocations, not just three.</p>	<p>1. Noted</p> <p>2-4. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>2-4. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>3. Shropshire Council considers that the proposed development strategy for Hodnet is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A187	B001	Updated Housing and Employment Topic Paper.	Paragraphs 7.63-7.64	Yes	Yes	1. Supports Plan proposals because they will ensure delivery which reduces impact on Green Belt and environment, at a slower rate allowing development to be assimilated.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A188	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	1. Supports the local plan as it protects the environment & robustly protects Albrighton's Green Belt as an important resource for agriculture, recreation, biodiversity as a result of sustainable farming and its role in reducing flooding impact in light of climate change. 2. Supports identified sites for development. Beyond these sites , Albrighton Green belt should not be released for development, including in relation to developer proposals for P36a & b. 3.Large employment sites should be at RAF Cosford & other in smaller buildings. 4. Larger scale shopping easily accessed from Albrighton and larger scale local provision would undermine local offer. 5. Phased delivery will ensure development a rate appropriate to the character of Albrighton	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A189	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65 and Tables 8.1 and 8.3 of the updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the updated Green Belt Topic Paper.	Yes	Yes	1.Albrighton offers an attractive village & community. Proposals protect the Green Belt around Albrighton, local character and the environment in support of sustainability and biodiversity in the face of climate change. 2.Supports the local plan, which is in line with national policy & has been subject to extensive work & appropriate public consultation across Shropshire & community engagement in Albrighton. 3.Local Plan allocations, safeguarded land and other sites with permission provide clearly defined and sufficient provision for housing to meet needs to 2038 and beyond. Local Plan provides certainty for communities across Shropshire. 4.There is evident careful consideration and identified reasoning for identification of additional requirement for 500 dwellings and proposed sites within Tasley, Shrewsbury and around the old Ironbridge power station. (Additional Sustainability Appraisal Report 12.1 – 12.3) These sites are appropriate to meet Black Country contribution which cannot appropriately be met in Albrighton. 5.Existing sites identified for development in Albrighton. No additional required beyond these sites, Albrighton Green belt should not be released for development, including in relation to developer proposals for unsuitable sites P36a & b. Long term housing needs beyond to be met by safeguarded sites 6.P36a & b. assessed by SA as unsuitable for development. Significant impacts of development of this land include loss of green belt, agricultural land green space; traffic problems , split community and there are heritage considerations. 7.Large employment sites should be at RAF Cosford	1-7. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A190	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General Comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A191	B001	Updated Housing and Employment Topic Paper.	Paragraph 2.5 Updated Housing and Employment Topic Paper.	Yes	No	1. Support the Council's conclusions in respect of the need to deliver Option 2 (a 1,500 dwelling contribution towards the unmet housing need of the Black Country). However, this should be a minimum figure to accord with NPPF (paragraph 11).	1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.	No
A191	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 6.37 Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Yes	No	1. Support intention to deliver sustainable development. However, delivery of the full range, type and tenure of homes to achieve the social objectives of sustainable development is needed, this being linked to the spatial strategy and ensuring there is a mix and range of sites allocated, delivered in the right locations and supported by the necessary infrastructure.	1. Noted. No specific changes are proposed.	No
A191	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 12.38 Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Yes	No	1. Support meeting the unmet housing need of the Black Country through the allocation of sites that are associated with Much Wenlock, however opportunity afforded by the sustainable site MUW006 has been missed. 2. As set out in detail in the vision document provided (including site information, context, process, technical evidence summary, opportunities/constraints & preliminary masterplan), the site is a logical and sustainable location for residential development which has been shaped by robust technical work. Site is suitable, available & deliverable within 5 years of plan adoption, having no major constraints (as identified in the 2018 SLAA) & being promoted by a landowner with single ownership. 3. Additionally the site provides an opportunity to mitigate flood risk through the provision of a flood alleviation scheme 4. Sustainability of this site confirmed through the work undertaken by the Council Sustainability Appraisal and its conclusions.	1. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper. 1-4. Shropshire Council considers that the proposed development strategy for Much Wenlock is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.	No
A191	B004	Updated Housing and Employment Topic Paper.	Paragraph 16.130 Updated Housing and Employment Topic Paper.	Yes	No	1. Flood risk is a very significant local consideration in Much Wenlock. Site MUW006 provides an important opportunity to mitigate flood risk through the provision of a provision of a flood attenuation scheme delivered alongside residential development. This should be a significant factor in site allocation to deliver Black Country contribution alongside delivering a solution to the ongoing issue of flooding in the Town.	1. Shropshire Council considers that the proposed development strategy for Much Wenlock is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.	No
A191	B005	Updated Housing and Employment Topic Paper.	Paragraphs 8.12/8.13 Updated Housing and Employment Topic Paper.	Yes	No	1.Option 3 supported and be taken forward, particularly the identification of new strategic sites associated with existing settlements in order to provide additional capacity. To be effective sites which are allocated must be deliverable within five years, located in sustainable locations (scored as 'Good' in the Overall Settlement Sustainability Conclusion and Overall Black Country Contribution Sustainability Conclusion). 2. Site MUW006 – meets the criteria and has the potential to deliver up to 230 new homes. 3. This would assist the Local Plan in meeting NPPF requirements in delivering the full range, type and tenure of homes to achieve the social objectives of sustainable development.	1-3. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.	No

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A191	B006	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Table 12.1 Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Yes	No	1. Assessment of Site MUW006 as 'good' in both SA's is correct. However, site has been incorrectly omitted as it is available – as well as suitable and achievable (as set out).	1. Shropshire Council considers that the proposed development strategy for Much Wenlock is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.	No
A191	B007	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Updated Stage 2a – Sustainability Appraisal Site Assessment	Yes	No	1. Support the assessment of Site MUW006 as 'good' in both SA's but should be identified as available as well as suitable, achievable and viable. Site should have been subject to further detailed assessment as part of the Updated Stage 3 Site Assessment for Much Wenlock & was only excluded on the basis that the Council were not aware that it was available.	1. Shropshire Council considers that the proposed development strategy for Much Wenlock is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.	No
A192	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation. Updated Housing and Employment Topic Paper.	General Comments	Yes	Yes	1. Response identifies close working with the local planning authority, recognising the historic context of Ludford , to deliver a good mix of housing & DDA compliant properties, with affordable and special requirement housing part of the previous. It is highlighted that there is also an established traveller site, good quality local employment and a grocery shopping offer. Initiatives to support EV facilities sustainable travel and energy conservation in Ludford/Ludlow are also identified.	1. Noted. No specific changes are proposed to the strategy for Ludford as a result of the additional material that was the subject of this consultation..	No
A193	B001	Updated Green Belt Topic Paper.	Paragraphs 7.5b, 7.18	Yes	No	1.Green belt release in Alveley, in particular ALV009, would be detrimental to principles of rural preservation and environmental stewardship and role of green belt including as a buffer to urban sprawl; safeguarding landscape, biodiversity, and agricultural heritage. 2. Development would compromise distinctive village & community character and amenity, the ecological & aesthetic value of the countryside. Conflict with ensuring sustainable, considerate growth that aligns with the existing needs and amenities of the community. 3.. The village has sufficient & diverse housing of all types to meet needs, with vacant housing available & failing to sell. 4. Further development would strain local infrastructure and resources. 5. No need for further recreational development. However, if ALV006/ALV007 taken forward rather than ALV009, this would have the benefit of funding a new Community Interest Company plans to build a new social hub/sporting facilities as well as providing for further housing needs through provision of 90 homes.	1-5. Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.	No
A194	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 5,24-5,27 and 6.4-6.8, Updated Green Belt Topic Paper. Appendix 3, Additional Sustainability Report Housing Paragraph 16.64 Housing & Employment Topic Paper	Yes	Yes	1. Supports the local plan as it protects Albrighton's Green Belt and therefore village character and Green Belt role in for agriculture, recreation, wildlife and supporting wellbeing, whilst making necessary provision for housing. 2. Green space in development not a substitute for loss of green belt. 3. Existing identified sites for development and safeguarded land to meet needs beyond 2038. Beyond these sites, Albrighton Green belt should not be released for housing, including in relation to developer proposals for P36a & b. 4. Larger scale employment buildings should not be developed in Green Belt , would add to traffic issues and would undermine local offer and high street.	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A195	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	Paragraphs 8.7-8.8 12.1-12.3, Table 12.4.	Yes	Yes	1.Important that Albrighton and its Green Belt are protected from development. Albrighton offers an attractive village, important opportunities for recreation in the surrounding Green Belt & community. 2.Supports the local plan proposal as they stand. 3.Other more appropriate locations for development than Green Belt.	1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A196	B001	Updated Housing and Employment Topic Paper. Updated Additional Sustainability Appraisal of the Draft Shropshire	Not specified	Not Specified	Not Specified	<p>1. Highlights previous responses to all earlier consultations and significant engagement, including pre application enquiry, with the Council & participation at examination hearings with a focus on the provision of employment land, particularly at Shrewsbury.</p> <p>2. Note production of updated Housing and Employment Topic Paper to address and clarify matters raised by the Inspectors in respect of derivation and testing of Plan housing and employment requirement for homes and employment land and need for the contribution towards the unmet needs of the Black Country to be tested separately.</p> <p>3. Welcomes Update Topic Paper conclusion that reversion to a High Growth' scenario and resulting uplift in employment requirement can be achieved sustainably.</p> <p>4. Support the uplift and the disaggregation of the Shropshire and Black Country requirements set out by the Topic Paper, supported by the accompanying update to the SA, with an additional need for Shropshire of 20ha.</p> <p>5. Updated analysis by the Council in the Topic Paper supports the argument previously presented by the respondent to the examination that identified need for Shropshire, before Black Country need is considered, is not addressed. Identification of requirements set out in Topic Paper, informed by the revised SA, effectively ring-fences Black Country supply to provide 30ha contribution to meet the needs, and highlights that the Plan must do more to meet the basic needs of Shropshire.</p> <p>6. Given increased overall new housing and employment land targets for the plan period, need for employment land supply has further increased. Plan not robustly meeting employment land requirements, an additional 20ha requirement is therefore problematic. As previously detailed in our client's submissions at the Regulation 19 and as part of the Matter 4 Hearing Statement, the Council's employment land strategy, then set against the lower 270ha for Shropshire (with 50ha of this land required at Shrewsbury), was already deficient.</p> <p>7. Strategy flawed. Shrewsbury Place Plan strategy only seeks to allocate a gross supply of 50ha of employment land on two sites (paragraph 16.153 of the Topic Paper)— SHR060, SHR158 & SHR161 and SHR166. These sites have significant known delivery constraints. The former as part of a phased approach to the overall urban extension, unlikely to be delivered until later in the plan period. SHR166 now comprises a Scheduled Ancient Monument & will likely be deleted.</p> <p>8. The significant supply issues are not addressed by the Council given strategic importance of Shrewsbury and uncertainty of delivery of proposed key employment site SHR166. Whilst it is suggested at paragraphs 5.92 -5.98 of the previous Housing and Employment Topic Paper (GC28) that there is no need to replace SHR166 if deleted, due to the residual supply versus need at the time (August 2023) this is superseded by the review of growth scenarios and the uplift in the requirement for Shropshire.</p> <p>9. As per Matter 3 Hearing Statement, contend there is insufficient flexibility in the Council's employment land development strategy to ensure sufficient land comes forward to meet market demands. Policy basis (SP13 and SP14) will not bring sufficient windfall and Policy SP12 lacks of monitoring criteria to ensure that supply sufficient to meet need. A further review of previously submitted Matter 3 suggestions & suggested policy/approach amendments as part of this consultation required.</p> <p>10. Object to exclusion of Shrewsbury as a location to meet Black Country's employment need. In considering the area of search for sites to meet the Black Country's need, the Topic paper (Paragraphs 16.156 and 16.157) whilst acknowledging Shrewsbury as a potential alternative location to Shifnal to deliver a strategic site to contribute to meeting Black Country employment need, it is inappropriately ruled out despite strong functional links and opportunity afforded by Shrewsbury, solely for lack of proximity.</p>	<p>1-4. Noted.</p> <p>5-6, 9 and 12-13. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to support the achievement of the proposed spatial strategy for Shropshire – including the proposed contribution to the unmet needs forecast to arise in the Black Country. Clear explanation of the decision making applied in reaching these conclusions is provided.</p> <p>7. Shropshire Council considers that the proposed development strategy for Shrewsbury is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p> <p>8. Shropshire Council recognises that much of site SHR166 contains a newly designated Scheduled Monument (designated in late 2022). This matter is currently being given due consideration, informed by ongoing engagement with the site promoter. The Council expects for this issue to be considered through the 'stage 2' hearing sessions.</p> <p>10 and 11. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						<p>11. There is strong objection from the community and other interested parties to the removal of Green Belt at Shifnal. Shrewsbury provides an appropriate strategic location outside the Green Belt. Scrutiny needs to be given as to whether the exceptional circumstances test is satisfied.</p> <p>12. Insufficient reasoning for exclusion of Site SHR197/SHR197VAR at submission in favour of other constrained sites. Site SHR197/SHR197VAR (Battlefield Roundabout, Shrewsbury) provides a significant opportunity to meet the supply shortfall being : supported by evidence base and appropriately included by the council at Regulation 18 Pre-Submission draft stage; demonstrated to be devoid of physical & environmental constraints; sustainably located in evidenced commercially desirable location within a strategic corridor and marketable, viable and quickly deliverable.</p> <p>13. Allocation of site SHR197/SHR197VAR would provide certainty of delivery and complement the commercial uses and existing allocations that currently exist in proximity. Additional work undertaken in 2024 has identified preliminary scheme phasing & substantiated demand for site with specific interest from several operators. Proposed masterplans, which reflect all relevant constraints and specific operator requirements have been prepared and submitted for consideration in support of delivery potential.</p>		
A197	B001	Green Belt Topic Paper	Paragraph 6.4 & 6.8	Yes	Yes	1. Should remain characteristically rural. Development would remove agriculturally productive land. Not appropriate to make provision for Black Country need in Albrighton.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A198	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General Comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A199	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the Additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65, and Tables 8.1 and 8.3 of the Updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8, and 6.13 of the Updated Green Belt Topic Paper.	Yes	Yes	<p>1. Fully support the draft Shropshire Local Plan. It concludes which sites are suitable for future housing needs of Shropshire. It has been informed by consultation with the Albrighton community and protects the Green Belt and the community. The plan should be stuck to and development contrary to it refused.</p> <p>2. Paragraphs 12.1-12.3 of the additional Sustainability Appraisal (SA) demonstrates Shropshire Council have considered the housing needs of the Black Country and chosen the most appropriate sites to meet to accommodate this (at Tasley, Shrewsbury & Ironbridge Power Station). With regard to paragraph 6.13 of the Green Belt Topic Paper, Albrighton is not the right place to accommodate contributions to the Black Country.</p> <p>3. Paragraphs 7.63-7.64 of the Housing and Employment Topic Paper demonstrates we are not opposed to development given the 500 dwellings proposed for the village to 2038. Within Table 12.4 of the additional SA and Table 8.1 of the Housing and Employment Topic Paper, it is apparent over 500 new homes are planned at Albrighton, including two allocations (which should be steadily developed over a 10 year period, as per Table 8.3 of the Housing and Employment Topic Paper). With regard to paragraph 16.64 of the Housing and Employment Topic Paper, Albrighton should not have large employment buildings developed in the Green Belt, which are sufficient/other provision would detract from it), employment should be direct to RAF Cosford. Agree with paragraphs 5.24-5.27 that safeguarded land should be for development post 2038. No other sites are required and Green Belt/character of the village should be protected (particularly P36A and P36B).</p> <p>4. Within Appendix 3 of the additional SA, the Council has concluded sites P36A and P36B should not be developed. This is important, these sites should remain Green Belt, and are in proximity of listed buildings and conservations areas, which would be harmed by their development.</p>	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A200	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the Additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65, and Tables 8.1 and 8.3 of the Updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8, and 6.13 of the Updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it balances provision of housing with the need to protect green spaces/Green Belt (essential for farming, people and wildlife). Development contrary to this (particularly in the Green Belt) should be refused.</p> <p>2. Agree sites at Tasley, Shrewsbury and the Former Ironbridge Power Station are best suited to accommodate proposed contributions to the Black Country. There are more suitable locations in Shropshire that Albrighton to accommodate proposed contributions to the black Country However, consider this need is best met where it arises.</p> <p>3. Albrighton has at present over 500 new houses planned/constructed/recently completed. Proposed allocations for Albrighton are reasonable. There should be no further development until after 2038. The three proposed areas of safeguarded land for further housing should not be developed until after 2038 - see if they are required through consideration of how the housing situation has evolved. There is no requirement for a supermarket, sufficient capacity at schools to 2038 and no need for a minor injury unit (where would staff come from?). Consider no other sites should be developed as over-development would ruin the villages character (particularly not Green Belt or for the Black Country) - once Green Belt it developed, it is lost forever. Brownfield sites should be developed first.</p> <p>4. Appendix 3 of the additional Sustainability Appraisal (SA) considered the site promoted by Boningale Homes and concluded they should not be developed. These sites should remain as Green Belt; they are far from the village centre, and will negatively affect infrastructure.</p> <p>5. Understand the need to accommodate the proposed 500 dwelling uplift to the housing requirement. Any proposals need careful consideration and good planning to ensure a good balance for the existing community, resources and amenities.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation. 2. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A201	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs and Tables 12, and 12.1-12.4, Paragraphs 13, 13.46 and 13.54, and Appendix 3 of the Additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.73-8.84, 16.64-16.65, and Tables 8.1-8.3 of the Updated Housing and Employment Topic Paper. Paragraphs 2.1-2.12, 4.7-4.10, 4.15-4.21, 5.3, 5.8, 5.16, 5.24-5.27, 6.1, 6.4-6.8, 6.13, 6.19d and 14.14 of the Updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan, however it needs to be adopted as soon as possible. Development must be in accordance with the draft Shropshire Local Plan.</p> <p>2. The site assessment process has been very thorough and agree that sites at Tasley, Shrewsbury and Ironbridge Power Station (where the planning permission demonstrates it can accommodate more development) are best suited to accommodate contributions to the Black Country. Albrighton is not suitable for sites to accommodate contributions to the Black Country.</p> <p>3. Albrighton village is growing, with over 770 new houses built/under construction/proposed for allocation. This is needed to maintain housing stock and give children opportunities to grow up and live in the village. Agree with the two proposed allocations at Albrighton (ALB017&ALB021), which should be subject to sustainable phased development over 10 years. Also agree with the safeguarded land which should not be developed until after 2038. No other sites should be provided/developed, including for employment, supermarkets, schools or healthcare facilities (particularly not in the Green Belt).</p> <p>4. Agree with the assessment of sites P36A and P36B within appendix 3 of the additional Sustainability Appraisal (SA). Development of these sites should not be supported, as they are not suitable and need to remain as Green Belt farmland. This area is important as it maintains the separation with Bonginale and is adjacent to Lee Hall listed buildings. It is also disconnected from Albrighton and would negatively affect traffic.</p> <p>5. Consider the assessment of housing requirement options is reasonable and sensible and support the proposed 500 dwelling increase to the housing requirement, which will benefit housebuilding across the country. Consider the review of windfall rates and capacity of proposed allocations based on actual planning applications improves accuracy and is beneficial.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A202	B001	Updated Housing and Employment Topic Paper.	Paragraph 9.10	Yes	No	<p>1. Sites identified to meet contribution to Black Country needs are proposed allocations which were already included within the submission version Plan. Therefore, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Thus, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire.</p> <p>2. There are sites appropriate to meet local needs associated within higher-tier settlements, in line with the proposed spatial strategy. These would make an appropriate contribution to meeting an uplift in the overall dwelling requirement and offset the loss of sites specifically identified to meet the needs of the Black Country. An example of such a site would be site WHT002 within Whitchurch, a Principal Centre settlement, the allocation of which would contribute to meeting Shropshire's housing needs and ensure the settlement benefits from a sufficient number of households to maintain the vitality of the settlement's services and facilities and secure the future of the settlement.</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate. It should be noted that the submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan.</p> <p>2. Shropshire Council considers the proposed development strategy for Whitchurch is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at Whitchurch have been informed by a proportionate and robust site assessment process.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A202	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 6.8	Yes	No	1. Do not consider that no contribution to the Black Country represents a reasonable option given that paragraph 11 of the National Planning Policy Framework (NPPF) references providing for unmet needs in neighbouring areas and ongoing work in the West Midlands illustrates that the shortfall is increasing. Given this, consider an uplift in Shropshire's contribution towards the housing needs of the Black Country (above that proposed in Option 2), rather than Option 1's no contribution should be considered.	1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.	No
A202	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 10.51-10.52	Yes	No	1. The proposed approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). Consider additional site allocations should be identified to ensure that the Plan is justified, deliverable and effective	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.	No
A202	B004	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.82-12.87	Yes	No	1. The assessment of sites to accommodate proposed contributions to the Black Country considered all sites in the relevant assessment geography. As recognised in paragraph 12.84 of the additional Sustainability Appraisal (SA) it is not surprising sites identified for this purpose are proposed allocations. However, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Therefore, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire. 2. There are sites appropriate to meet local needs outside the identified assessment geography associated with higher-tier settlements which would offset the loss of any sites specifically identified to meet the needs of the Black Country, whilst also meeting settlement specific housing requirements. An example of such a site would be site WHT002 within Whitchurch, a Principal Centre settlement, the allocation of which would contribute to meeting Shropshire's housing needs and ensure the settlement benefits from a sufficient number of households to maintain the vitality of the settlement's services and facilities and secure the future of the settlement.	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate. 2. Shropshire Council considers the proposed development strategy for Whitchurch is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at Whitchurch have been informed by a proportionate and robust site assessment process.	No
A202	B005	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Table 8.6	Yes	No	1. The Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and resultant uplift is supported. However, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A202	B006	Updated Housing and Employment Topic Paper.	Paragraph 7.61	Yes	No	1. The Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and resultant uplift is supported. However, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.	No
A202	B007	Updated Housing and Employment Topic Paper.	Paragraphs 8.65-8.66	Yes	No	1. The proposed approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). Consider additional site allocations should be identified to ensure that the Plan is justified, deliverable and effective	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A203	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General Comments	Not Specified	No	<p>1. Consider that the draft Policy should be reconsidered as it is far too long. This is consistent with the requirements of paragraphs 15 and 16d/f of the National Planning Policy Framework (NPPF). Components of the draft policy can be moved to the explanation.</p> <p>2. Concerned with the proposed approach to supporting people to live as independently as possible. The Strategic Housing Market Assessment (SHMA) identifies significant need for specialist housing but paragraph 1 is not clear that specialist housing can support independent living and could be perceived as addressing conventional housing that is designed to be adaptable. Firmly of the view that ensuring residents have the ability to stay in their homes for longer is not, by itself, an appropriate manner of meeting the housing needs of older people. This could be made clearer by combining and cutting down paragraph 1 and 8 of the policy and making sure the policy is clear in its support for specialist housing for older people.</p> <p>3. Paragraphs 2 and 7 expect all specialist housing for older people be built to M4(3) standards. This requirement is not sound, justified or consistent with national policy (or guidance - reference to National Planning Practice Guidance on Viability and Housing for Older and Disabled People). No evidence is provided by the Council that shows this is necessary or viable (no form of housing is assessed at 100% M4(3) standard). M4(3) standards have a large cost implication and will serve to reduce the number of dwellings that can be delivered on a site, affecting affordability and further reducing viability. This concern was previously raised in the Matter 8 response submitted.</p> <p>4. Consider Sheltered Housing and Extra Care Accommodation should be specifically considered within the Viability Assessment, as this is best practice (reference to the National Planning Practice Guidance on Housing for Older and Disabled People). This should have specifically considered the viability of affordable housing requirements, CIL and M4(3) provision.</p> <p>5. Concerned about the limited cost that has been put towards the additional cost of M4(3) housing, which is substantially less than the cost of compliance - reference to the Retirement Housing Consortium paper entitled 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons and other examples of assessments by Local Authorities.</p> <p>6. With regard to paragraph 9 of the policy, specialist housing for older people tend to be well located close to town centres or facilities within local centres. Such schemes contain communal areas (including gardens) and these need to have some separation and security. We would therefore recommend the wording 'gated-off' be removed as this could create an unrealistic expectation.</p> <p>7. With regard to paragraph 11 provision of appropriate key worker accommodation for any associated care staff' would provide an additional cost that should be included within a viability study.</p> <p>8. Paragraphs 15 to 17 require a proportion of up housing (up to 20%) on larger sites to consist of specialist housing for older people. Question if this is actually deliverable.</p> <p>9. Note paragraph 8 of the policy seeks affordable housing contributions from specialist housing, in line with draft policy DP4. Object to this requirement and have provided justification for it in our Matter 8 hearing statement. This was not assessed within the Viability Assessment.</p>	<p>1. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. The Council considers the requirements of the policy are necessary given it addresses a significant range of issues. The Council does not consider it appropriate for policy requirements to be moved into the policy explanation.</p> <p>2. The clear purpose of this policy is to support the achievement of the housing needs of older people and those with disabilities and special needs in a way that aligns with the Council's social care strategy (People's Strategy). Shropshire Council considers criterion 1 of the draft Policy effectively establishes the principle that the housing required to meet the needs of older people and those with disabilities and special needs includes both accessible and adaptable housing and appropriate forms of specialist housing - indeed this paragraph specifies as much.</p> <p>3. Shropshire Council acknowledges the requirements of paragraphs 2 and 7 of the draft policy are comparable and as such is proposing a main modification to amend this.</p> <p>3 and 4. Shropshire Council would be very surprised if it was suggested that achievement of M4(3) (wheelchair user dwellings) standard within Building Regulations constitutes an additional cost for any form of specialist housing specifically designed for older people. It is expected that this would be a default design requirement for any such housing to ensure it meets the current/future needs of intended occupiers. It is also important to recognise that much of this form of housing benefits from economies of scale in achieving these design requirements. Finally, the Council would note that this proposed requirement already formed part of the submission version of the draft Shropshire Local Plan.</p> <p>4 and 9. To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken. With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes such housing will be "subject to a viability assessment at the point of a planning application". This approach is considered consistent with national guidance.</p> <p>4. The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations.</p> <p>5. Shropshire Council considers the Whole Plan Viability Assessment to be proportionate and robust.</p> <p>6. Shropshire Council recognises some specialist housing may have specific security and operational requirements. However, it is considered these can be achieved whilst ensuring it integrates into rather than being gated-off from existing and new communities.</p> <p>7. Housing for key workers can include appropriate forms of market housing and affordable housing. Such provision is considered within the Whole Plan Viability Assessment.</p> <p>8. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Furthermore, within paragraphs 38-41 ID28 the Inspectors concluded that there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. Reflecting these factors, it is considered appropriate to specify the proportions of specialist housing expected on</p>	Yes

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							<p>larger development sites.</p> <p>To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken.</p> <p>With regard to the optional building regulations accessible and adaptable housing standards, the proposed standards for general housing are specifically considered within the Whole Plan Viability Assessment.</p> <p>With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes that such housing will be "subject to a viability assessment at the point of a planning application", consistent with national guidance.</p> <p>The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations. However, the Council recognises that viability can vary between the different forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution which is responsive to needs and development viability.</p> <p>It is also important to note that many forms of specialist housing represent high-density development and as such can achieve effective use of land enhancing viability, may also constitute a proportion of the affordable housing contribution, and also represents an additional outlet on the scheme, which can increase the sites marker, have positive effects on deliverability, and speed-up timescales - which aligns with Government aspirations.</p> <p>However, it is acknowledged that there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such, the Council is proposing a modification to this draft Policy to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies.</p> <p>Furthermore, consistent with the conclusions of the Whole Plan Viability Assessment a modification is proposed to allow the provision of reduced rates of specialist housing provision where it is demonstrated that this is creating viability concerns for otherwise sustainable schemes.</p> <p>Furthermore, it is recognised that there may be circumstances where a specific site is unsuitable for specialist housing or there is no identified need for such housing in the area; as such the Council proposes a modification to this draft Policy to allow for the provision of reduced rates of specialist housing provision where the Council agrees one or both of these circumstances apply.</p> <p>9. Paragraph 18 of the draft policy does not seek affordable housing contributions from specialist housing, rather it recognises that in some instances specialist housing can also constitute affordable housing.</p>	

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A204	B001	Updated Housing and Employment Topic Paper.	Paragraph 8.3	Yes	No	<p>1. Support the proposed approach to accommodating the proposed uplift to the housing requirement (Option 1 increasing settlement guidelines and windfall allowances). But consider to be sound and consistent with paragraph 70 of the National Planning Policy Framework (NPPF), the settlement boundary at Whitchurch, which is tightly drawn, needs to be expanded to afford sufficient windfall opportunities. Inclusion of land off Alkington Road, adjacent Winspur is one such modest amendment which would yield appropriate housing (12-15 units) early in the plan period. Further details/plans on this potential expansion to the settlement boundary provided in support.</p> <p>2. Support the Council's continued focus on the high growth option for the housing requirement, seeking to achieve a 15% uplift on local housing need whilst also making an allowance for meeting the unmet needs of the Black Country authorities.</p> <p>3. There is a need to be cautious about reliance on windfall (as per paragraph 70 of the NPPF) as much of the recent delivery has been as a result of speculative development when the Council did not have a 5 year housing land supply.</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>1. Shropshire Council considers that the proposed development strategy for Whitchurch is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p> <p>2. Noted.</p> <p>3. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p>	No
A205	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, 6.4-6.8, 7.63-7.64 and 16.64	Yes	Yes	<p>1. Support the draft Shropshire Local Plan, which protects the Green Belt around Albrighton. Current and proposed developments at the village are carefully considered but must be phased to ensure it does not overwhelm the character/community. But strongly oppose any further new developments (including supermarkets and schools) in the Green Belt as the infrastructure (particularly doctors, schools, roads and parking) is already strained and would destroy local community shops and businesses. Any such proposals should be refused. Green Belt is important to sustain the farming culture, health and wellbeing of residents and wildlife.</p> <p>2. Consider there are more suitable locations in Shropshire to accommodate contributions to the Black Country than Albrighton.</p>	<p>1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

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A206	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	General comments	Not Specified	No	<p>1. Support the proposed 500 dwelling uplift to the housing requirement, but question the approach (increasing settlement guidelines and windfall allowances) to accommodating this uplift. Consider it would be more appropriate and sound to spread housing distribution more evenly across the county in sustainable settlements via densification of proposed site allocations and increasing site allocations more generally.</p> <p>2. Church Stretton is identified as a sustainable settlement, but there are no allocations proposed to achieve the settlement's housing guideline, with reliance instead placed on windfall. Previously raised concerns about this approach during the Regulation 19 consultation. Land at Snatchfield Farm, Church Stretton is available and a suitable location for around 70 dwellings.</p> <p>3. With regard to the sites identified to accommodate proposed contributions to the Black Country, contend it would be more appropriate to spread contributions more evenly across numerous sites in sustainable settlements and through the intensification of some existing allocations, not just three. The addition of such a large quantum of dwellings on already significantly large draft allocations has the potential to slow delivery of homes. Spreading the need more evenly will allow for sites to be built out faster to meet this pressing need.</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>2. Shropshire Council considers that the proposed development strategy for Church Stretton is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations) and proposed windfall allowances identified to contribute towards achieving each proposed development strategy).</p> <p>3. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p>	No
A207	B001	Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8	Yes	Yes	1. Support the draft Shropshire Local Plan. Do not want over-development or development on the Green Belt.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A208	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General Comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A209	B001	General Comments	General Comments	Not Specified	Not Specified	<p>1. Note the significant levels of new provision for older people and those with disabilities and special needs that would result from the new draft policy. The NHS is supportive of the approach in the People's Strategy of wherever possible supporting people to remain independent within their own homes, within their existing communities and with access to established support networks.</p> <p>2. To provide appropriate health care facilities are available for an ageing population both close to rural communities as well as higher level specialised centralised services, resourcing is required. Through the examination the Council has acknowledged the importance of health infrastructure and that it is appropriate to support this through new development (including through CIL). The new draft policy reinforces this matter and the need to deliver extra resourcing to support improvements in the health sector.</p>	1-2. Noted.	No

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A210	B001	Updated Housing and Employment Topic Paper.	Section 2; Paragraphs 8.29, 8.73, 8.87 and 16.125-16.139; and Table 8.4	No	No	<p>1. The Sustainability Appraisal and the related Housing & Employment paper are unsound as they fail to meet national policy and will lead to unsustainable development.</p> <p>2. On the assessment of accepting 1,500: -The additional Sustainability Appraisal (SA) acknowledges negative impacts (para 6.22) but tries to argue these will be marginal given the scale of development. This is a weak argument and logically would be the plan can do nothing on any development proposal. -The additional SA suggests scale of development can provide opportunities to deliver benefits (e.g. biodiversity net gain). This is absurd as trade-offs between loss of soil/food production and housing provision not assessed (housing is considered the trump card). -No scheme of mitigation proposed to offset acknowledged detriments; a proper strategic assessment should set out a strategic response to ensure SA Objectives (especially 6 (private car use) and 10 (flood risk)) will be met. As such the plan will make matters worse and is therefore unsound. -In sensitive locations like Much Wenlock (Rapid Response Catchment, Conservation Area, traffic issues, lack of infrastructure, etc) marginal differences have great impact and need addressing.</p> <p>3. The principle of the proposed 1,500 dwelling contribution to the Black Country has not been challenged despite recent changes, including the easing of requirements to meet top-down housing targets (including the 20% uplift at Wolverhampton) and weakening of the duty to cooperate. These factors remove a key strategic driver for allocations on the east side of the county and mean the approach fails to meet national guidance.</p> <p>4. The Updated Housing & Employment Topic Paper and additional SA contain multiple contradictions and statements unsupported by evidence, revealing a failure fail to meet national guidance and statutory obligations on the relationship between local plans and neighbourhood plans.</p> <p>5. Paragraphs 16.125-16.139 of the Housing & Employment Topic Paper and Appendix 7 of the additional SA state Much Wenlock does not have a strategic role in meeting housing or employment needs, but propose a large allocation (MUW012VAR). It should be for a review of the Neighbourhood Plan to allocate sites in the context of strategic policy. If there is no strategic driver, it should be for this review to determine the scale and location of development.</p> <p>6. Consultation documents recognise infrastructure deficiencies and flood risk at Much Wenlock, but propose a large site allocation (MUW012VAR). This site is the most flood-vulnerable site in the town and even the SA acknowledges that it is not the most sustainable location, rating it only as 'fair.' This is contrary to national policy. They then fail to address/mitigate known weakness of public transport links leading to inevitable increases in car commuting and carbon emissions, making the draft Shropshire Local Plan undeliverable. Justification includes addressing flood risk that would otherwise need investment (e.g. from the large level of government funding available for the Severn Catchment).</p> <p>7. Reference is made to a functional relationship between Much Wenlock and the Black Country, but this is not explained/justified. Reference is also made to the A458 corridor, but this has no status/is not explained and does not go to the Black Country. These are then set aside and the Housing & Employment Topic Paper concludes there is no significant strategic relationship between Much Wenlock and the Black Country.</p>	<p>1. The Council considers the additional Sustainability Appraisal (SA) and Housing & Employment Topic paper effectively summarise the additional assessment and planning judgement undertaken by the Council. This process is considered proportionate and robust.</p> <p>2 and 3. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>4-6. Shropshire Council considers that the proposed development strategy for Much Wenlock is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p> <p>7. The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Shropshire Council considers that this is an appropriate assessment geography within which reasonable options for accommodating contributions to the Black Country will be located.</p>	No
A210	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 6.22 and Appendices 1 and 7	No	No	1. See A210 B001	1. See response to A210 B001	No

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A211	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Sections 6, 7, 8, 9, 10 and paragraphs 10.3-10.4 and Sections 11 & 12 and paragraph 12.38(f) with Table 12.3 & Appendix 4.	Not Specified	No	<p>1. It is recognised that the Updated Additional SA responds to the Examining Inspectors findings in ID36 particularly paragraph 10 to increase the development requirements and to consider allocating more sites especially in proximity to the Black Country, paragraph 15 to assess reasonable alternatives to contributing towards Black Country unmet needs and paragraph 16 to assess sites for their suitability to contribute towards Black Country unmet needs and to issues raised by the Examining Inspectors in ID28 including paragraph 22 regarding the Council's earlier Additional SA (GC29).</p> <p>2. A number of issues can be identified about the methodology and conclusions of the Updated Additional SA. These should be considered alongside the Draft Plan criteria for identifying sites to meet Black Country unmet needs which comprised: seeking the most sustainable locations that provide sufficient connectivity to commute between the Black Country and Shropshire with a choice of the most sustainable transport modes:</p> <ul style="list-style-type: none"> - the SA methodology is broadly supported especially in Sections 6 - 9 because the Council seek to contribute 1,500dws to the Black Country and uplift the provision of housing for Shropshire but still the uplift is not proportionate to the evidence of need and demand in Shropshire. - the range of housing options are noted along with the Council's conclusions that Housing Option 1 is the most sustainable, Housing Option 3 should be the updated housing requirement for the County and contribute 1,500dws to the Black Country and a 500dws uplift for Shropshire. - the housing sites that will contribute to the Black Country unmet need are noted in Shrewsbury, Bridgnorth and Ironbridge. It is noted that no new housing sites are proposed to be allocated in the Draft Plan. <p>3. These findings raise the following issues for consideration at the further Examination Hearings:</p> <ul style="list-style-type: none"> - the distribution strategy to accommodate the uplift to the proposed housing requirement (Section 10 of the SA) includes reliance on windfall allowances which are not guaranteed and introduces potential double counting of the allowance for windfall delivery already in the Draft Plan. - the reliance on windfall allowances introduces a degree of risk to the delivery of housing to meet the strategy objectives and outputs. - approach is not the most appropriate, proactive or sustainable way to plan for additional growth within Shropshire, particularly given the carefully considered spatial strategy and Plan at Examination, and the need to ensure consistent consideration of the reasonable alternatives and strategy for meeting the unmet need in the Black Country. - but the Council is supported in its conclusion that Shifnal is one of the most sustainable locations to locate residential development (as identified in Paragraph 12.38(f)) given its close proximity to the Black Country, its migration and commuting patterns and its accessible rail link. - the housing sites allocated to meet the Black Country unmet need are not additional sites in the context of ID36 but were identified in the Submission Draft Plan. To meet this unmet need, the allocated sites should be in highly sustainable locations, this implies locations with in the M54 corridor connecting Shrewsbury to Dudley/Wolverhampton and support migration and commuting patterns. - Shrewsbury and Ironbridge are recognised as sustainable locations for commuting and brownfield development. However, Bridgnorth is poorly connected with a lower locational sustainability and consequently preferred site BRD030 does not warrant a Fair sustainability conclusion. - BRD030 is not supported as a preferred site to meet the Black Country unmet need although it may be suitable as a sustainable urban extension to meet demand in Shropshire. The Appendix 4 Site Assessment of BRD030 shows: <ul style="list-style-type: none"> > The A458 physically and functionally separates BRD030 from the urban form of the town and this separation includes landownership constraints. 	<p>1. Noted.</p> <p>2. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>3. Shropshire Council considers that the proposed development strategy for Shifnal is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p>	No

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						<p>> The physical separation will require a series of measures to facilitate sustainable travel and other sustainability issues with measures including direct walking and cycling routes, a footbridge over the A458, bus provision through the site, highway improvements and possibly a Park & Ride.</p> <p>> Alternative transport modes would be required to facilitate rail access from Bridgnorth by providing access to rail stops at Telford, Albrighton and Shifnal.</p> <p>- Locating the housing contribution to the Black Country in Shifnal on SHF034 would provide direct access to the M54 road links and to the rail corridor between Shrewsbury and Wolverhampton. Shifnal has a strong functional relationship with the Black Country and therefore could provide a relatively high and meaningful proportion of the contribution to the Black Country unmet need.</p> <p>> SHF034 has known infrastructure requirements and is a suitable location in planning terms subject to the findings of further supporting studies.</p>		
A211	B002	Updated Housing and Employment Topic Paper.	Paragraphs 7.7, 7.37-7.41, Figure 7.1 Paragraphs 17.16-17.46 & Table 7.4	Not Specified	No	<p>1. It is considered that the 500dw uplift on the housing requirement to 31,300dws at 1,423dpa to contribute 1,500dws towards unmet housing needs in the Black Country has been justified. Unfortunately, the housing requirement is not sufficiently positively prepared in relation to available evidence including technical evidence submitted previously by Miller Homes and now including the Turley Falling Even Shorter Report.</p> <p>2. The Council should again increase their housing requirement to a higher figure and agree a higher contribution with the Black Country Authorities towards their unmet housing needs. This position is based on the following evidence:</p> <p>- Matter 4 Statement with the Report 'Update to the Technical Review of Sustainable Growth Plans for Shifnal' recognised the key factors that:</p> <p>> recent rates of housing delivery in Shifnal provide evidence of strong demand which exceeds the proposed housing guideline for Shifnal by around 15% despite the peaks and troughs caused by annual changes in demand. Unless the proposed housing guideline for Shifnal is increased the affordability ratio for the town will continue to increase making it more difficult to access housing in the town.</p> <p>> anticipated jobs growth would exceed the labour force growth from a housing delivery rate around 1,400dpa and would result in an imbalance between housing and jobs growth. This also reflects the fact that Shropshire has higher demographic growth than anticipated in the Standard Method from 2014-based projections where annual population estimates indicate a higher working age population. Consequently, Shropshire and Shifnal are likely to deliver more labour where sufficient housing numbers are delivered.</p> <p>> there is greater potential to contribute towards the substantial unmet needs in the Black Country and GBBCHMA.</p> <p>> there is potential to meet a higher proportion of the affordable housing need and to manage the sale and rate at which this need increases.</p> <p>- Unsubstantiated alignment of job growth and housing need where the proposed housing requirement is considered to support the diversification of the labour force and the aspiration for increased economic growth and productivity.</p> <p>> these factors are important and included in NPPF para 67 but the current strong jobs growth (11,069 jobs) against the updated jobs target for the 320ha employment land requirement (21,400 jobs) is neither supported nor clearly evidenced by the proposed 31,300dws housing requirement despite its proposed 500dws uplift.</p> <p>> the Updated Topic Paper re-considers the sources of labour to bridge the gap with actual and future anticipated jobs growth. These sources of supply are unsubstantiated and largely beyond the control of policy. Consequently, there remains a risk of imbalance between jobs growth and housing growth which undermines the ability to demonstrate that the Plan is justified. A more positive plan-led approach is recommended to justify the Plan which would require the identification of a housing requirement that is higher again than the uplifted</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p> <p>2. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						<p>31,300dws.</p> <ul style="list-style-type: none"> - Recognition of a much greater unmet need for housing in the West Midlands caused by unmet need in the Greater Birmingham & Black Country Housing Market Area (GBBCHMA) and the absence of plan-led solutions to address these unmet needs. > This has now been addressed further in the Turley Report Falling Even Shorter (attached). Despite the GBBCHMA Position Statement indicated a reduced shortfall to 2031 of only 2,053dws, the Turley Report suggests the Standard Method applied at an updated base date of March 2023 indicates a housing shortfall of 34,742 dwellings by 2031 and 62,373dws by 2036. This would indicate an even higher shortfall at the end of the Shropshire Plan period in 2038. > Increasing the Shropshire contribution towards unmet housing needs would help to sustainably address the balance between future jobs and homes in Shropshire. This would also recognise that Shropshire has been more successful in attracting additional residents than captured in the demographic projections used in the Council's assessment of need. - Responding more positively to the need for affordable housing is recognised in para 7.7 of the Updated Topic Paper and responds to the Council's Housing Strategy (GC4h / EV063.01). The Council recognise the affordable housing need stands at round 5,000 households but the annual rate of delivery stands at around 343dpa and the need continues to grow with changes to the affordability ratios across the County. The Council's preceding Housing Topic Paper (GC4i) para 4.15 recognised the Draft Plan would deliver 25% of the housing requirement or 7,700dws as affordable units at 350dpa but this is somewhat short of the SHMA (EV097.02) annual need for 799dpa. Whilst the 500dws uplift will contribute towards this unmet affordable need, planning for an even higher level of housing growth will have a greater impact on the scale of unmet affordable housing need. 		

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A211	B003	Updated Green Belt Topic Paper.	Para 5.27, Table 5.1, 9.1, 9.3, 9.4	Not Specified	No	<p>1. The strategic approach of high growth with an urban focus that also delivers 1,500dws towards unmet needs in the Black Country is supported. It is considered appropriate that this strategic approach includes Key Centres like Shifnal due to their role, function, services and infrastructure including rail links to principal urban centres. It is noted that the Green Belt land releases are identified in Table 5.1 and that para 5.27 ensures that all but 39ha would meet Shropshire's future needs whilst the 39ha are allocated for employment use to 2038. It is considered that this strategic approach requires greater flexibility to include South-West Shifnal to provide homes to meet the needs of Shropshire and / or neighbouring authorities.</p> <p>2. Shifnal is the largest Key Centre, the town is in a sustainable location and has a relationship with the Black Country described in paras 9.1, 9.3, 9.4 and Figure 3.1 and is suitable for development identified in Figure 4.1 including the proposed 39ha employment land allocation on SHF018b/018d in East Shifnal which will meet the entirety of the 30ha contribution from Shropshire towards the Black Country unmet employment land need.</p> <p>3. It is recommended that Table 4.1 and the Draft Plan be amended to provide a site in South West Shifnal to meet Black Country unmet housing need to provide greater flexibility in housing delivery through the Plan period to 2038. Allocating additional housing sites in sustainable locations within the Green Belt including Key Centres with established rail links will ensure the substantial housing shortfall in the Black Country is met and that the housing is provided in close proximity to the Black Country Authorities.</p> <p>4. It is also recommended that the SoCG with the Black Country is amended to include a higher contribution towards their unmet housing needs.</p> <p>5. It is further recommended that the Draft Plan be amended to include both this higher contribution and a mechanism for an early review of the Plan to ensure Shropshire's needs and any unmet needs in the Black Country are kept under review and addressed at the earliest opportunity.</p>	<p>1. Support in principle for the Shifnal development strategy is welcomed.</p> <p>2. Support for the Shifnal employment land allocation is welcomed.</p> <p>3. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>4. The Inspectors have found that the Council have met their legal duty to co-operate with other local planning authorities in accordance with Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended).</p> <p>5. The Council have set out their preferred strategy for development to 2038 in Shropshire and Shifnal including making an appropriate contribution towards unmet development needs in the Black Country and this is set out within the Submission Draft Local Plan with Proposed Modifications and supporting evidence documents. The Council has also identified the functional relationship between Shropshire and the Black Country Authorities and indicated that future Plan preparation will consider unmet development needs in the Black Country.</p>	No
A212	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General Comments	No	No	<p>1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.</p>	<p>1. Noted, see response to A0153.</p>	No
A213	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 12.4 and 6.4-6.8 and Appendix 3	Yes	Yes	<p>1. The draft Shropshire Local Plan identifies three development sites at Albrighton, so no more are required. Passionate about keeping farm land for farming as it is important we grow our own food. Green spaces are also important for health and wellbeing.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A214	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	General Comments	Yes	No	<p>1. Consider the draft Shropshire Local Plan would benefit from less reliance on windfall employment land delivery. The entirety of the 20ha uplift to the employment land requirement is to be accommodated through windfall development. Reliance on windfall means the Plan is not positively prepared as it does not specifically seek to meet identified needs for employment but rather relies on unidentified sites. It is also not consistent with national policy which expects a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. Instead this should be accommodated through additional site allocations.</p> <p>2. The draft Shropshire Local Plan continues to rely on proposed allocation SHR166 which since submission has become heavily constrained and capacity substantially less than proposed. This will require further employment to be brought forward.</p> <p>3. None of the options identified to accommodate the proposed uplift to the employment land requirement entailed further site allocations. This appears to be an oversight, it should have been considered and is the most sustainable option.</p> <p>4. Promote sites SHR195 and SHR044 for employment development, they total 7.9ha and could deliver up to 15,000sqm of Employment floorspace on the edge of Shrewsbury in a sustainable location (site plan accompanies the response). SHR195 is identified as one of only 2 'category a' employment sites at Shrewsbury in the Council's Employment Land Review (2019). Within the additional Sustainability Appraisal (SA), SHR195 is identified as poor, this contradicts the Employment Land Review (2019). Proposed allocation SHR166 also performs poor within the additional SA (and would perform more poorly now due to the presence of the scheduled monument on the site which has not been reflected within the update) and was only category B in the Employment Land Review (2019). Consider SHR195 is more sustainable than SHR166 and it is uncertain why the site has not been proposed for allocation and reliance placed on windfall.</p> <p>5. Consider there are flaws within the additional SA assessment of sites, which could lead to sustainable sites being discounted unnecessarily: -Query the walking distance (480m) used within the additional SA, when others (including Sustrans) utilise 800m. If the existing employment in the settlement was tested on this basis much would not be within 480m of relevant services, so would be deemed unsustainable. The same distances are also used for employment and residential/ -There is little capability to adjust the -All the criteria within the additional SA area scored as single unit, with little capability to adjust this score given severity - e.g. not being within 480m of a GP is the same as being 1m from a SSSI.</p> <p>6. In principle, support identification of the high-growth options for housing and employment growth, as higher growth has the potential to deliver more economically beneficial outcomes which is particularly relevant to a county with a rising proportion of economically inactive residents.</p> <p>7. Paragraph 7.24 of the Housing and Employment Topic Paper indicates the Council's view that there is a correlation between greater growth and greater economic and social benefits but also greater environmental impact. This is not always the case.</p>	<p>1 and 3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the employment land requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement. It is important to note that the Council have an identified employment land supply which totals 413ha of land and includes proposed 'saved' allocations, proposed new allocations and smaller scale windfall development which comprises both brownfield and greenfield land and the redevelopment of premises on established employment areas. For the avoidance of doubt, one of the options considered by the Council was increasing site allocations (either through extensions to existing proposed allocations or new site allocations).</p> <p>2. Shropshire Council recognises that much of site SHR166 contains a newly designated Scheduled Monument (designated in late 2022). This matter is currently being given due consideration, informed by ongoing engagement with the site promoter. The Council expects for this issue to be considered through the 'stage 2' hearing sessions.</p> <p>4, 5 and 7. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.</p> <p>6. Noted.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A214	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	General Comments	Yes	No	<p>1. Evidence from the last two Censuses (2011 and 2021) points to the need to provide homes for an ageing population and also to create the conditions and opportunity to attract younger families and the economically active.</p> <p>2. Consider the new draft policy does not capture some solutions to allow people to remain living in rural communities close to friends and families able to support them. This includes providing downsizing opportunities and provision of housing for extended families to live independently on the same site.</p> <p>3. Consider that the policy should make positive provision for the assessment of retirement villages which would not be delivered on allocated housing sites. Retirement villages have proven to be a successful model, providing opportunities for residents to move from more independent accommodation to ever-more supported accommodation as their needs change.</p> <p>4. Site SHR216 was previously identified as a preferred allocation in November 2018. Part of this site (5.4ha) now promoted for a dedicated retirement village which should be allocated for retirement living/sheltered housing and extra care housing/ housing-with- care (with two nursing homes in the local area that already provide for this type of need and other facilities nearby). This site would complement the existing health/care allocation which forms part of the Shrewsbury West SUE. Response includes details in support of the allocation of the site and maps illustrating the location and connectivity of the site.</p>	<p>1. Noted.</p> <p>2. Draft Policy DP1 addresses housing mix, with the intention of ensuring smaller housing which could facilitate downsizing.</p> <p>3 and 4. The draft policy identifies a range of mechanisms to support the delivery of specialist housing for older people, including retirement villages.</p> <p>4. Shropshire Council considers that the proposed development strategy for Shrewsbury is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p>	No
A214	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 6.8	Yes	No	<p>1. Do not consider that no contribution to the Black Country represents a reasonable option given that paragraph 11 of the National Planning Policy Framework (NPPF) references providing for unmet needs in neighbouring areas and ongoing work in the West Midlands illustrates that the shortfall is increasing. Given this, consider an uplift in Shropshire's contribution towards the housing needs of the Black Country (above that proposed in Option 2), rather than Option 1's no contribution should be considered.</p>	<p>1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p>	No
A214	B004	Updated Housing and Employment Topic Paper.	Paragraph 7.61	Yes	No	<p>1. The Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and resultant uplift is supported. However, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A214	B005	Updated Housing and Employment Topic Paper.	Paragraphs 8.65-8.66	Yes	No	1. The proposed approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). Consider additional site allocations should be identified to ensure that the Plan is justified, deliverable and effective	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.	No
A214	B006	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Table 8.6	Yes	No	1. The Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and resultant uplift is supported. However, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.	No
A214	B007	Updated Housing and Employment Topic Paper.	Paragraph 9.10	Yes	No	1. Sites identified to meet contribution to Black Country needs are proposed allocations which were already included within the submission version Plan. Therefore, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Thus, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire. 2. There are sites appropriate to meet local needs associated within higher-tier settlements, in line with the proposed spatial strategy. These would make an appropriate contribution to meeting an uplift in the overall dwelling requirement and offset the loss of sites specifically identified to meet the needs of the Black Country. Examples are SMH017 & SMH030 which have been the subject of pre-application. St Martins is proposed to be designated as a Community Hub within the draft Plan with policy S14.2 identifying a residential guideline of around 355 dwellings over the plan period. This site could and should make a significant contribution to this figure as an allocated site rather than relying upon windfall development to accommodate the need.	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate. It should be noted that the submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. 2. Shropshire Council considers the proposed development strategy for St Martins is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at St Martins have been informed by a proportionate and robust site assessment process.	No
A214	B008	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 10.51-10.52	Yes	No	1. The proposed approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). Consider additional site allocations should be identified to ensure that the Plan is justified, deliverable and effective	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A214	B009	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.82-12.87	Yes	No	<p>1. The assessment of sites to accommodate proposed contributions to the Black Country considered all sites in the relevant assessment geography. As recognised in paragraph 12.84 of the additional Sustainability Appraisal (SA) it is not surprising sites identified for this purpose are proposed allocations. However, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Therefore, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire.</p> <p>2. There are sites appropriate to meet local needs outside the identified assessment geography associated with higher-tier settlements which would offset the loss of any sites specifically identified to meet the needs of the Black Country, whilst also meeting settlement specific housing requirements. Examples are SMH017 & SMH030 which have been the subject of pre-application. St Martins is proposed to be designated as a Community Hub within the draft Plan with policy S14.2 identifying a residential guideline of around 355 dwellings over the plan period. This site could and should make a significant contribution to this figure as an allocated site rather than relying upon windfall development to accommodate the need.</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p> <p>2. Shropshire Council considers the proposed development strategy for St Martins is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at St Martins have been informed by a proportionate and robust site assessment process.</p>	No
A215	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	Yes	Yes	<p>1. Consider the Council's strategy and conclusions reached with regard to housing and employment provision are sound, fully justified and legally compliant.</p> <p>2. The proposed approach (utilising settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing land requirement is sound, justified and the most sustainable option. Do not consider there is any justification for the allocation of additional housing or employment sites.</p> <p>3. Support the proposed annual housing requirement of 1,420 dwellings.</p>	1-3. Noted.	No
A216	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 12.4 and Appendix 3	Yes	Yes	<p>1. Support the draft Shropshire Local Plan. It is comprehensive and balanced, with the interests of the local community at its heart. Consider proposed allocations for Albrighton are proportionate and will allow for manageable expansion of the village.</p> <p>2. Consider development proposals by Boningale homes would negatively affect the local community and put intolerable strain on local services (particularly primary care and traffic management/safety).</p>	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A217	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	Paragraphs 66 and 70.	Not Specified	No	<p>1. A Housing Need Assessment for Much Wenlock, undertaken to inform the ongoing Neighbourhood Plan Review, concludes that between 80 and 96 units of specialist housing are required over the plan period; this equates to almost half the total housing. Some of this can be provided by adapting existing housing; and new requirements for most housing to be adaptable and a percentage to be for wheelchair users (which is very welcome).</p> <p>2. Consider proposed allocation MUW012VAR fails to comply with this draft policy, fails to recognise the increase ageing of the population of Much Wenlock since the site was assessed, and fails to respond to community wishes. It is the furthest point from community facilities and public transport links. Alternative sites (MUW011) and windfall opportunities are more suitable location and likely to achieve the proposed housing guideline.</p> <p>3. Concerned about the strategy to reduce need for residential homes without high-levels of care. Shropshire has a low density population and loneliness is a major problem in old age. Only housing close to facilities where residents can join in activities and meet/make friends should be considered appropriate for home care and to reduce need for residential homes. Cost savings should not come at the detriment to the mental health and wellbeing of older and disabled residents.</p>	<p>1. Noted.</p> <p>2. No specific changes are proposed to the proposed strategy for Much Wenlock as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed development strategy for Much Wenlock is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). It is considered that the requirements of this draft Policy are achievable on MUW012VAR.</p> <p>3. The Council's social care strategy (People's Strategy) outlines the Council's approach to effectively meeting the needs of older people and others requiring care in our communities. The purpose of this policy is to support the achievement of the housing needs of older people and those with disabilities and special needs in a way that aligns with this Strategy.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A217	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Appendices 7 and 10	No	No	<p>1. The Council's stated policy is avoidance of development in areas prone to flooding, but proposed to allocate site MUW0012VAR which regularly floods. As such, this assessment is unsound. Justification is that a wide-ranging solution to this will be provided for both the site and existing adjacent sites. However:</p> <ul style="list-style-type: none"> -No reference is made to the fact Much Wenlock is in a Rapid Response Flood Catchment Area (the severest category). -Past drainage schemes have not been monitored so not completed (reference to Hunters Gate, Falcon Court and Callaughton Ash). -Proposals presented for MUW012VAR include flood water storage on parkland on the other side of the Much Wenlock Barrow Road. This includes a Scheduled Monument and lack confidence it will be monitored/implemented. -The Council should be the lead in any major flood attenuation scheme. <p>2. Clarity is required as to whether the A458 and A4169 strategic corridors. These are inconsistently referenced.</p>	<p>1. No specific changes are proposed to the proposed strategy for Much Wenlock as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed development strategy for Much Wenlock is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process. This process has been informed by specific consideration of flood risk and was directly informed by a Stage 1 and Stage 2 Strategic Flood Risk Assessment.</p> <p>1. Shropshire Council is aware of Much Wenlock's rapid response catchment designation, which has been the case for some time. This informed the proposed strategy for Much Wenlock and the site assessment process. The site assessment process undertaken to inform the selection of proposed site allocations is considered proportionate and robust. This process has been informed by specific consideration of flood risk and was directly informed by a Stage 1 and Stage 2 Strategic Flood Risk Assessment.</p> <p>1. Draft site guidelines for proposed allocation MUW012VAR include very clear expectations for the site to manage flood risk. The Council considers this site provides an opportunity to achieve community benefit, most notably implications for on and off site flood alleviation at Hunters Gate and Forester Avenue.</p> <p>2. The explanation to draft Policy SP2 of the draft Shropshire Local Plan identifies proposed strategic corridors. These include Eastern Belt M54/A5/A41/A464/A5 and A454/A458, supporting Shropshire's links to the West Midlands region and the role of the West Midlands Combined Authority, including opportunities around Bridgnorth as a Principal Centre within the context of the ongoing Green Belt Review.</p>	No
A217	B003	Updated Housing and Employment Topic Paper.	Paragraphs 7.59(f), 9.10 and 16.12; and Tables 8.5 and 9.1.	Not Specified	No	<p>1. The online only consultation makes it difficult for the lay person to ask questions and seek clarification.</p> <p>2. This document as with the updated Sustainability Appraisal contains inconsistencies. The contribution to the unmet housing needs of the Black Country is described as an 'uplift' of 1,500 dwellings. Clarity is required that in accommodating 600 dwellings of this contribution the Former Ironbridge Power Station Site will not exceed 1,075 dwellings at least the 2038.</p> <p>3. Concerned about the impact of contributions to the Black Country on Much Wenlock. One of the routes to access the Black Country from the Former Ironbridge Power Station Site is the A4169/A458 through Much Wenlock (although consider a rabbit-run through Sutton Maddock on the B4176 more likely). Furthermore, the 300 dwelling contribution on a site in Shrewsbury will necessitate additional traffic on the A458.</p> <p>4. The assessment incorrectly states Shifnal and Telford are the nearest stations to the Former Ironbridge Power Station Site, in actuality it is Wellington.</p> <p>6. No reference/limited reference or consideration of the fact that Much Wenlock is in a Rapid Response Flood Catchment Area (the severest category). The poor roads in the area should also be given more consideration.</p> <p>5. Paragraph 16.127 states Highley is in the Much Wenlock Place Plan Area, this is incorrect.</p> <p>6. See A217 B001.</p>	<p>1. The Council considers this consultation process has been appropriate and consistent with its Statement of Community Involvement and national requirements.</p> <p>2. For the avoidance of doubt, whilst specific contributions to the Black Country on the proposed allocations at Tasley Garden Village and the Former Ironbridge Power Station, this has not resulted in an increase to their overall capacity. This relates to existing dwellings proposed on the site, recognising they are well-placed to accommodate part of the proposed housing contribution to the Black Country.</p> <p>3 and 4. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>5. Noted. This was a typographical error.</p> <p>6. See A217 B001.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A218	B001	Updated Housing and Employment Topic Paper.	Paragraphs 2.5, 2.8, 2.14, 2.24, 16.81-16.96 and Table 9.1	Not Specified	No	<p>1. Object to proposed allocation BRD030, which is ill-conceived and carelessly planned (reference regulation 19 representation). This is the first time the scheme has been called an urban extension, previously it was termed a garden settlement. This scheme will result in loss of a significant area of good quality agricultural land; significantly increase the population of Bridgnorth (35%); destroy the character of the town and surrounding countryside; increase traffic/congestion (particularly on the A458); will be separated from Bridgnorth by the A458 (a footbridge is not an adequate solution); there is inadequate parking in the town which will be exacerbated by increased journeys from the site; commuting will exacerbate existing congestion in Bridgnorth and Much Wenlock; and surrounding roads are unsuitable for employment development (as acknowledged in the Topic Paper) yet allocations/proposed allocations in the area total 40ha. There is no plan to address infrastructure requirements of the development (roads, water, sewage, medical, dental, utilities) - this is deferred to the developer and unlikely to be delivered.</p> <p>2. Consider existing allocations (capacity for 560 dwellings) which was recently granted consent are sufficient to satisfy local housing need (hoping it includes adequate proportion of affordable properties). However, concerned that no new medical facilities are proposed on the site, with existing facilities at Shrewsbury and Bridgnorth stretched (which would be further exacerbated by BRD030 - doubtful medical facilities proposed on the site will arise before it is completed).</p> <p>3. Consider claims in the Black Country that housing needs cannot be met are demonstrably untrue, there are numerous brownfield sites available and recent Government announcements are being ignored. As such, it is entirely unnecessary for Shropshire to accommodate a 1,500 dwelling contribution (including the significant proportion in Bridgnorth).</p>	<p>1-2. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p> <p>3. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>3. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p>	No
A219	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	No	<p>1. Data on changes to the age of the Shropshire population between the 2011 and 2021 census point to the need to provide homes both for an ageing population but also to create the conditions and opportunity to attract younger families and the economically active.</p> <p>2. The aspirations of this development plan policy are laudable, but it is drafted in a manner that is both wordy and granular and may not capture the broader aspirations the policy seeks - supporting independent living/personal choice/cohesive communities.</p> <p>3. Paragraphs 2-6 set out opportunities for accessible/adaptable housing. But all opportunities to support independent living are not captured, such as opportunities for down-sizing (in the community); provision of housing to meet the needs of extended families independently on the same site; and looking holistically at rural communities to meet future needs.</p>	<p>1. Noted.</p> <p>2. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. It forms part of the wider strategy to meet the housing needs of Shropshire.</p> <p>3. Draft Policy DP1 addresses housing mix, with the intention of ensuring smaller housing which could facilitate downsizing.</p>	No
A219	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments	Yes	No	<p>1. Baschurch has been recognised as a Community Hub settlement for development and site BNP024 designated as a proposed allocation in the draft Local Plan. The allocation of site BNP024 would contribute to meeting Shropshire's housing needs and also ensure that Baschurch benefits from a sufficient number of households in the settlement to maintain the vitality of the settlement's services and facilities and secure the future of the settlement. BNP024 is sustainable and constitutes a small to medium sites in sustainable location (consistent with the National Planning Policy Framework).</p>	<p>1. No specific changes are proposed to the proposed strategy for Baschurch as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed development strategy for Baschurch is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A219	B003	Updated Housing and Employment Topic Paper.	General comments	Yes	No	<p>1. In principle support the proposed housing requirement, because higher growth has the potential to deliver more economically beneficial outcomes which is particularly relevant to a county with a rising proportion of economically inactive residents.</p> <p>2. Consider the proposed approach to accommodating the proposed uplift to the housing requirement - increasing settlement guidelines/windfall allowances in three settlements (Shrewsbury, Whitchurch and Buildwas/Former Ironbridge Power Station) is inappropriate, as there is a finite/dwindling supply of windfall sites and recent changes like biodiversity net gain reduces potential. This approach therefore lacks certainty and is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). It is considered this will be challenged in the context of Sustainability Appraisal, as it does not identify other locations and limits development.</p> <p>3. Paragraph 7.24 indicates the Council's view that there is a correlation between greater growth and greater economic and social benefits but also greater environmental impact. This is not always the case.</p>	<p>1. Noted.</p> <p>2 and 3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No
A220	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	No	<p>1. Data on changes to the age of the Shropshire population between the 2011 and 2021 census point to the need to provide homes both for an ageing population but also to create the conditions and opportunity to attract younger families and the economically active.</p> <p>2. The aspirations of this development plan policy are laudable it is drafted in a manner that is both wordy and granular and may not capture the broader aspirations the policy seeks - supporting independent living/personal choice/cohesive communities. Larger hub settlements such as Minsterley are more likely to fulfil these objective in the context of Shropshire a large and otherwise sparsely populated county.</p> <p>3. Paragraphs 2-6 set out opportunities for accessible/adaptable housing. But all opportunities to support independent living are not captured, such as opportunities for down-sizing (in the community) or alternatively the provision of housing to meet the needs of extended families independently on the same site.</p>	<p>1-3. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. It forms part of the wider strategy to meet the housing needs of Shropshire.</p> <p>3. Draft Policy DP1 addresses housing mix, with the intention of ensuring smaller housing which could facilitate downsizing.</p>	No
A220	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments	Yes	No	<p>1. Minsterley has been recognised as a Community Hub settlement for development. Allocation of sustainable site MIN018 (which falls within the typical small/medium Shropshire site) would contribute to meeting Shropshire's housing needs and ensure the settlement benefits from a sufficient number of households to maintain the vitality of its services and facilities and secure the future of the settlement.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Minsterley as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed development strategy for Minsterley is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations) and proposed windfall allowances identified to contribute towards achieving each proposed development strategy).</p>	No
A220	B003	Updated Housing and Employment Topic Paper.	Paragraph 7.24	Yes	No	<p>1. In principle support the proposed housing requirement, because higher growth has the potential to deliver more economically beneficial outcomes which is particularly relevant to a county with a rising proportion of economically inactive residents.</p> <p>2. Consider the proposed approach to accommodating the proposed uplift to the housing requirement - increasing settlement guidelines/windfall allowances in three settlements (Shrewsbury, Whitchurch and Buildwas/Former Ironbridge Power Station) which does not identify other locations specifically is a limiting approach to accommodating the additional housing numbers and subject to challenge in the context of the SA.</p> <p>3. Paragraph 7.24 indicates the Council's view that there is a correlation between greater growth and greater economic and social benefits but also greater environmental impact. This is not always the case & benefits such as contamination remediation & flood alleviation schemes cited.</p>	<p>1. Noted.</p> <p>2 and 3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>3. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A220	B004	Updated Housing and Employment Topic Paper.	Paragraphs 8.65-8.66	Yes	No	1. Consider the proposed approach to accommodating the proposed uplift to the housing requirement - increasing settlement guidelines/windfall allowances in three settlements (Shrewsbury, Whitchurch and Buildwas/Former Ironbridge Power Station) is inappropriate, as there is a finite/dwindling supply of windfall sites and recent changes like biodiversity net gain reduces potential. This approach therefore lacks certainty and is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF).	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.	No
A221	B001	Updated Housing and Employment Topic Paper.	Paragraph 9.10	Yes	No	1. Sites identified to meet contribution to Black Country needs are proposed allocations which were already included within the submission version Plan. Therefore, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Thus, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire. 2. There are sites appropriate to meet local needs associated within higher-tier settlements, in line with the proposed spatial strategy. These would make an appropriate contribution to meeting an uplift in the overall dwelling requirement and offset the loss of sites specifically identified to meet the needs of the Black Country. An example of such a site would be site PYC020 (Land adjoining The Red House, Pant) which is located within a Community Hub settlement, allocation of which would contribute to meeting Shropshire's housing needs and ensure the settlement benefits from a sufficient number of households to maintain the vitality of the settlement's services and facilities and secure the future of the settlement.	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate. It should be noted that the submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. 2. Shropshire Council considers the proposed development strategy for Pant is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at Pant have been informed by a proportionate and robust site assessment process.	No
A221	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 6.8	Yes	No	1. Do not consider that no contribution to the Black Country represents a reasonable option given that paragraph 11 of the National Planning Policy Framework (NPPF) references providing for unmet needs in neighbouring areas and ongoing work in the West Midlands illustrates that the shortfall is increasing. Given this, consider an uplift in Shropshire's contribution towards the housing needs of the Black Country (above that proposed in Option 2), rather than Option 1's no contribution should be considered.	1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.	No
A221	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 10.51-10.52	Yes	No	1. The proposed approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). Consider additional site allocations should be identified to ensure that the Plan is justified, deliverable and effective.	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A221	B004	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.82-12.87	Yes	No	<p>1. The assessment of sites to accommodate proposed contributions to the Black Country considered all sites in the relevant assessment geography. As recognised in paragraph 12.84 of the additional Sustainability Appraisal (SA) it is not surprising sites identified for this purpose are proposed allocations. However, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Therefore, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire.</p> <p>2. There are sites, associated with higher-tier settlements, appropriate to meet local needs outside the identified assessment geography which would offset the loss of any sites specifically identified to meet the needs of the Black Country, whilst also meeting settlement specific housing requirements. An example of such a site would be site PYC020 (Land adjoining The Red House, Pant) located within a Community Hub settlement, the allocation of which would contribute to meeting Shropshire's housing needs and ensure the settlement benefits from a sufficient number of households to maintain the vitality of the settlement's services and facilities and secure the future of the settlement.</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>2. Shropshire Council considers the proposed development strategy for Pant is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at Pant have been informed by a proportionate and robust site assessment process.</p>	No
A221	B005	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Table 8.6	Yes	No	<p>1. The Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and resultant uplift is supported. However, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p>	No
A221	B006	Updated Housing and Employment Topic Paper	Paragraph 7.61	Yes	No	<p>1. The Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and a resultant uplift in housing is supported. However, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p>	No
A221	B007	Updated Housing and Employment Topic Paper	Paragraphs 8.65-8.66	Yes	No	<p>1. The proposed Option 1 approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). Consider additional site allocations should be identified to ensure that the Plan is justified, deliverable and effective</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A222	B001	Updated Housing and Employment Topic Paper.	Paragraph 9.10	Yes	No	<p>1. Sites identified to meet contribution to Black Country needs are proposed allocations which were already included within the submission version Plan. Therefore, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Thus, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire.</p> <p>2. Consideration should be given to increasing opportunities for housing within all settlements in the settlement hierarchy. There are sites appropriate to meet local needs within settlements in all tiers of the settlement hierarchy, including within Community Cluster settlements. These would make an appropriate contribution to meeting an uplift in the overall dwelling requirement and offset the loss of sites specifically identified to meet the needs of the Black Country.</p>	<p>1 & 2. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate. It should be noted that the submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan.</p> <p>Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No
A222	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 6.8	Yes	No	<p>1. Do not consider that no contribution to the Black Country represents a reasonable option given that paragraph 11 of the National Planning Policy Framework (NPPF) references providing for unmet needs in neighbouring areas and ongoing work in the West Midlands illustrates that the shortfall is increasing. Given this, consider an uplift in Shropshire's contribution towards the housing needs of the Black Country (above that proposed in Option 2), rather than Option 1's no contribution should be considered.</p>	<p>1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p>	No
A222	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 10.51-10.52	Yes	No	<p>1. The proposed approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). It is therefore not considered likely that the approach will result in a strongly positive effect on SA objective 3: provision of a sufficient amount of good quality housing which meets the needs of all sections of society as stated in the SA. Consideration should therefore be given to increasing opportunities for housing within all settlements in the settlement hierarchy, including sites within Community Clusters, to offset the loss of any sites specifically identified to meet the needs of the Black Country whilst also meeting settlement specific housing requirements.</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A222	B004	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.82-12.87	Yes	No	<p>1. The assessment of sites to accommodate proposed contributions to the Black Country considered all sites in the relevant assessment geography. As recognised in paragraph 12.84 of the additional Sustainability Appraisal (SA) it is not surprising sites identified for this purpose are proposed allocations. However, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs.</p> <p>2. There are sites, available within settlements in all tiers of the settlement hierarchy, appropriate to make an appropriate contribution to meeting the uplift in the overall dwelling requirement and meet local needs outside the identified assessment geography which would offset the loss of any sites specifically identified to meet the needs of the Black Country, whilst also meeting settlement specific housing requirements. Therefore, there should be increased site allocations and amendments to policy wording to enable the provision of greater levels of housing development throughout all tiers of the settlement hierarchy. The wording of policy SP9 'Managing Development in Community Clusters' should be amended (as detailed within previous Regulation 19 representation), to increase acceptable site size limits, thereby enabling greater levels of housing provision.</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p> <p>2. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement. Shropshire Council also considers the proposed development strategy for Shropshire, including the criteria set out in SP9 in relation to Community Clusters, is appropriate, effective, sustainable, and deliverable.</p>	No
A222	B005	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Table 8.6	Yes	No	<p>1. The Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and resultant uplift is supported. However, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p>	No
A222	B006	Updated Housing and Employment Topic Paper	Paragraph 7.61	Yes	No	<p>1. The Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and resultant uplift is supported. However, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A222	B007	Updated Housing and Employment Topic Paper	Paragraphs 8.65-8.66	Yes	No	1. The proposed approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). Consider a more positive approach should be used to ensure that the Plan is justified, deliverable and effective with additional site allocations identified and amendments to policy wording to enable the provision of greater levels of housing development throughout all tiers of the settlement hierarchy. The wording of policy SP9 'Managing Development in Community Clusters' should be amended (as detailed within previous Regulation 19 representation), to increase acceptable site size limits, thereby enabling greater levels of housing provision.	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement. Shropshire Council also considers the proposed development strategy for Shropshire, including the criteria set out in SP9 in relation to Community Clusters, is appropriate, effective, sustainable, and deliverable.	No
A223	B001	Not stated	General comment	Not Specified	Not Specified	1. No formal response as a Town Council. Requests responses submitted by the local community given careful consideration.	1. Noted	No
A224	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	No	1. Data on changes to the age of the Shropshire population between the 2011 and 2021 census point to the need to provide homes both for an ageing population but also to create the conditions and opportunity to attract younger families and the economically active. 2. The aspirations of this development plan policy are laudable it is drafted in a manner that is both wordy and granular and may not capture the broader aspirations the policy seeks - supporting independent living/personal choice/cohesive communities. Larger hub settlements such as Minsterley are more likely to fulfil these objective in the context of Shropshire a large and otherwise sparsely populated county. 3. Paragraphs 2-6 set out opportunities for accessible/adaptable housing. But all opportunities to support independent living are not captured, such as opportunities for down-sizing (in the community) or alternatively the provision of housing to meet the needs of extended families independently on the same site.	1-3. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. It forms part of the wider strategy to meet the housing needs of Shropshire. 3. Draft Policy DP1 addresses housing mix, with the intention of ensuring smaller housing which could facilitate downsizing.	No
A224	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments	Yes	No	1. Cressage has been recognised as a Community Hub settlement for development and site CES005 is a proposed allocation in the draft Local Plan. Allocation of site CES005 would contribute to meeting Shropshire's housing needs and ensure the settlement benefits from a sufficient number of households to maintain the vitality of its services and facilities and secure the future of the settlement.	1. Noted. No specific changes are proposed to the proposed strategy for Cressage as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A224	B003	Updated Housing and Employment Topic Paper.	Paragraph 7.24	Yes	No	<p>1. In principle support the proposed housing requirement, because higher growth has the potential to deliver more economically beneficial outcomes which is particularly relevant to a county with a rising proportion of economically inactive residents.</p> <p>2. Consider the proposed approach to accommodating the proposed uplift to the housing requirement - increasing settlement guidelines/windfall allowances in three settlements (Shrewsbury, Whitchurch and Buildwas/Formal Ironbridge Power Station) which does not identify other locations specifically is a limiting approach to accommodating the additional housing numbers and subject to challenge in the context of the SA.</p> <p>3. Paragraph 7.24 indicates the Council's view that there is a correlation between greater growth and greater economic and social benefits but also greater environmental impact. This is not always the case & benefits such as contamination remediation & flood alleviation schemes cited.</p>	<p>1. Noted.</p> <p>2 and 3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>3. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.</p>	No
A224	B004	Updated Housing and Employment Topic Paper.	Paragraphs 8.65-8.66	Yes	No	<p>1. Consider the proposed approach to accommodating the proposed uplift to the housing requirement - increasing settlement guidelines/windfall allowances in three settlements (Shrewsbury, Whitchurch and Buildwas/Formal Ironbridge Power Station) is inappropriate, as there is a finite/dwindling supply of windfall sites and recent changes like biodiversity net gain reduces potential. This approach therefore lacks certainty and is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF).</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No
A225	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 12.4 and Appendix 3	Yes	Yes	<p>1. Supports the local plan as need to protect Albrighton's Green Belt and village character.</p> <p>2. Sufficient provision has already been made for development in Albrighton.</p> <p>3. More suitable, alternative locations and options to meet Black Country need (including those identified at Tasley, Ironbridge, & Shrewsbury) are available which do not impact on special village character & community, Green Belt, agriculture, wildlife.</p> <p>4. Albrighton's infrastructure unable to accommodate significant development and the village character & environment is unsuitable to accommodate the expansion of necessary facilities to support development.</p>	<p>1-4 Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A226	B001	Updated Green Belt Topic Paper.	Paragraphs 5.23-5.27, 5.4, 6.4-6.8, Tables 4.1& 5.1	Yes	Yes	<p>1. Supports Local Plan.</p> <p>2. Green Belt plays a vital role in safeguarding the character and rural setting of Albrighton & providing recreational opportunities.</p> <p>3. Agrees with paragraphs 5.23 to 5.27 & role of identification of safeguarding sustainable land around settlements like Albrighton as a thoughtful approach to ensure the long-term community sustainability, assuming appropriate phasing.</p> <p>4. Agrees with findings in Table 4.1 and considers identified sites are suitable and sustainable options to accommodate Black Country need for housing and employment land, noting impact of subsequent abolition of Duty to Cooperate.</p> <p>5. Considerations regarding limited Green Belt release appear well-founded, including priority to build on brownfield and in sustainable locations.</p> <p>6. Work done by the Council in response is thorough and has reached a sound conclusion. Early approval of the Plan should proceed and will assist in opposed damaging, speculative development on Green Belt land.</p>	<p>1-6 Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A227	B001	Updated Housing and Employment Topic Paper	Paragraph 19	Yes	Yes	<p>1. Supportive of the urban focussed development which presents the greatest opportunity for sustainable development, with new development making use & enhancing existing infrastructure in settlements. The overall strategic approach also beneficially seeks to ensure that special areas within Shropshire such as the Shropshire Hills National Landscape are respected and preserved.</p> <p>2. All new development should deliver appropriate, high quality, green infrastructure with connections into existing and emerging wider green infrastructure networks. The allocation of Tasley Garden Village, Bridgnorth presents an opportunity to connect into the emerging National Trust Sandscapes project which seeks to better connect habitats and people to nature across this area of Shropshire. Thus, the allocation of this land should be supported by a robust green infrastructure policy which facilitates connections to Sandscapes and the wider green infrastructure network.</p>	1-2. Noted.	No
A227	B002	Updated Housing and Employment Topic Paper	Section 21	Yes	Yes	<p>1. Supportive of the proposed Spatial Strategy as representative of the pattern of development throughout Shropshire. Unplanned windfall development should also incorporate high quality open space which makes a contribution towards the green infrastructure network, regardless of the size of the development, to deliver benefits for both nature and people in respect of: habitat and ecosystems connectivity and public access to green space supporting residential developments.</p> <p>2. The emerging National Trust Sandscapes project, which seeks to better connect habitats and people to nature in South Shropshire, including the Bridgnorth area, could be identified as part of a green infrastructure network which windfall developments would be required to positively contribute towards where their location would permit this.</p>	1-2. Noted.	No
A228	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the Additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65, and Tables 8.1 and 8.3 of the Updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8, and 6.13 of the Updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan and consider it is consistent with National Policy. It clearly defines areas for current and future housing development in Albrighton/Shropshire which will ensure housing needs are to 2038 and beyond; which will help maintain control of the locations and densities of development. It also protects the Green Belt (a precious resource - important farming area, protects the character of the village, landscape value). It has been informed by engagement with the local community. New development should be in accordance with this plan.</p> <p>2. There are proposals for over 500 dwellings at Albrighton. Support proposed allocations ALB017&ALB021, which should be phased over a 10 year period, with less development to the end of the plan period. Also support identification of the three areas of safeguarded land, as they allow for long-term needs, they should not be developed until post 3028. No other sites should be developed at the village (including for employment, supermarkets, schools etc), particularly in the Green Belt or to accommodate contributions to the Black Country (concerned about road safety if significant development occurs in Albrighton).</p> <p>3. Encouraging to see joint engagement within the wider West Midlands. Consider the Council have reviewed all relevant sites and identified appropriate ones to accommodate contributions to the Black Country at Tasley, Shrewsbury and the Former Ironbridge Power Station.</p> <p>4. Sites P36A and P36B were considered unsuitable for development in the site assessment. These sites are not necessary as sufficient sites have already been identified. They should remain Green Belt, their development would result in loss of agricultural fields, their development would impact on the nearby conservation area/listed buildings, and would create traffic problems and negatively affect the community.</p> <p>5. Support the proposed increase to the housing requirement.</p>	1-5 Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A229	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the Additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65, and Tables 8.1 and 8.3 of the Updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8, and 6.13 of the Updated Green Belt Topic Paper.	Yes	Yes	<ol style="list-style-type: none"> 1. Support the draft Shropshire Local Plan as it delivers sustainable development for Albrighton in a measured and controlled manner. It also crucially protects the Green Belt and green spaces. 2. Agree proposed contributions to the Black Country should be accommodated at sites in Shrewsbury, Tasley and the Former Ironbridge Power Station site. As such no sites for this purpose are required at Albrighton (particularly in the Green Belt). 3. Please sites P36A and P36B were assessed and concluded not suitable for development. 4. Due to the climate emergency, housing development should use sustainable materials, include green energy, incorporate ecological features and traffic calming, and enhance the environment and community. 	<p>1-3 Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p> <p>4. Noted. The draft Shropshire Local Plan contains a range of policies which seek to ensure that development in Shropshire achieves a high-quality design, minimises carbon emissions and protects/enhances the built and natural environment.</p>	No
A230	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Appendix 3 of the Additional Sustainability Appraisal. Paragraphs 6.4-6.8 of the Updated Green Belt Topic Paper.	Yes	Yes	<ol style="list-style-type: none"> 1. Support the draft Shropshire Local Plan as it protected valuable agricultural land (important for food security); maintains community cohesion; and limits pressure on local amenities. 	<p>1 Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A231	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 12.4 and Appendix 3	Yes	Yes	<ol style="list-style-type: none"> 1. Consider development should be steady and controlled over a long period of time. There is insufficient infrastructure (particularly roads) for large scale development in Albrighton. 	<p>1 Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A232	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	paragraphs 3, 4, 5, 9-12, 3, 15, 17, 19, 21, 33, 55, 59(d), 61, 64, 70,71, 73, 77 and General Comments.	Yes	No	<p>1. Respondent addresses increasing demand for domiciliary care and declining nursing and residential home placements in period to 2035. It is proposed that domiciliary care is best provided within 'care village' developments which address a number of challenges firstly, the number of residents ensure the provision of care is sustainable, secondly, the scale of the facility enables older people to be discharged from hospital into a short term care facility before returning home (overcoming bed blocking) and improves staff recruitment, job satisfaction, the number of staff on zero hours contracts and better staff retention. This reflects the 2016/17 - 2022/23 trend of increasing CQC regulated domiciliary care services (+48%) and declining CQC regulated nursing care homes (-5%) and residential care homes (-11%) (Source: The State of Care 2022/23).</p> <p>2. Policy Criterion 3 should require more than 5% of housing should be built to MP4(3) standard to support an 80% increase in those aged 65+ years with dementia and 63% increase in those unable to perform one domestic activity independently.</p> <p>3. Policy Criterion 5 should require Building Regulation requirements to be considered in the determination of planning applications to enable care provision to be easily integrated into residential properties to support independent living.</p> <p>4. Policy Criteria 9 to 12 and explanation paragraph 21 should enable the provision of special units in Care Villages that provide short term care/rehabilitation to facilitate hospital discharges into the community to prevent hospital bed blocking.</p> <p>5. Policy Criterion 15 and explanation paragraphs 33 and 70 should facilitate access to services for assisted living including opticians, chiropody, dentists, physiotherapy, rehabilitation, carers and social centres within larger developments or easily accessible within the local community to support the care services and to reduce social isolation.</p> <p>6. Policy Criterion 17 should support a range of care village proposals that provide different scales of bungalows or accessible apartments to accommodate those with disabilities.</p> <p>7. Policy Criterion 19 and explanation paragraph 73 should support the provision of carer accommodation and office management suites. On-site living and training accommodation for carers will support staff recruitment and retention.</p> <p>8. Explanation paragraph 4 requires a further bullet 4(d): Moving within a care village setting but staying within the familiar community as health and circumstances change (e.g. moving from supported living flat into a residential care unit).</p> <p>9. Explanation paragraph 10 should identify locations where the older population is particularly expected to increase including Shifnal & Albrighton where the provision of care villages would offer a range of care solutions.</p> <p>10. Explanation paragraph 13 should recognise that assistive technologies require care staff to provide the support services and care villages provide high staffing levels to support these technologies.</p> <p>11. Explanation paragraph 21(?) should recognise older people have limited walking ranges and require accessible parking.</p> <p>12. Explanation paragraph 55 should recognise Housing with Care & Care Villages meet changing care needs without the individual relocating.</p>	<p>1. Noted.</p> <p>2. The draft Policy is clear that "On sites of 5 or more dwellings, at least 5% of the dwellings will be built to the M4(3) (wheelchair user dwellings) standard within Building Regulations". Shropshire Council considers that this appropriately supports the application of the policy.</p> <p>3, 4, 5, 6, 8, 9, 11, 14, 15, Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. It forms part of the wider strategy to meet the housing needs of Shropshire.</p> <p>7. Housing for key workers can include appropriate forms of market housing and affordable housing. Paragraph 11 of the draft policy is considered complementary to other mechanisms within the draft Shropshire Local Plan which seek to ensure the provision of housing appropriate for key workers. This includes draft Policy DP1 which addresses the size and mix of dwellings and draft policies DP3-DP7 which address the various mechanisms to deliver affordable housing in Shropshire.</p> <p>10. Noted. the important role of assistive technologies is recognised within the policy. These technologies require the intervention of care workers and other health and care professionals. It is recognised that a care village will provide these essential services to ensure assistive technologies are effective but these outcomes may be achieved with equal effect in other care settings.</p> <p>12, & 13. The clear purpose of this policy is to support the achievement of the housing needs of older people and those with disabilities and special needs in a way that aligns with the Council's social care strategy (People's Strategy). In addition, Draft Policy DP1 addresses housing mix, with the intention of ensuring smaller housing is delivered to a building format that will facilitate downsizing among the older population who wish to relocate to new housing within the general housing market.</p> <p>16. Noted.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						<p>13. Explanation paragraph 61 should recognise that better quality, future proofed accommodation for older people will improve their independence and release larger family homes into the open housing market.</p> <p>14. Explanation paragraph 71 should recognise that larger scale care villages provide accommodation and on-site services offering economies of scale in care provision enabling care workers who do not drive to perform multiple care duties in a single location and providing a strong return on investment to those commissioning care services.</p> <p>15. Explanation paragraph 77 should recognise the need for amenity space to be incorporated into care settings and a requirement for such development to be higher density with less amenity space is discriminatory.</p> <p>16. Explanation paragraph 81(d) should recognise that where existing specialist housing facilities are no longer fit for purpose then purpose built care villages can provide a range of high quality care services that improve outcomes for those in care.</p>		

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A232	B002	Updated Green Belt Topic Paper.		Yes	No	<p>1. The Updated Green Belt Topic Paper setting out the exceptional circumstances for releasing Green Belt land to meet unmet development needs in the Black Country is supported. This response recommends that these exceptional circumstances justify releasing 13ha of land south of Aston Hall from the Green Belt as a reasonable alternative to those already proposed or as an additional site and this position is supported by NPPF paragraphs 63 and 140.</p> <p>2. The 13ha of land around Aston Hall are located to the east, south and west and also fronts onto Stanton Road (south) and Coppice Green Lane (west) and this land is promoted as a housing allocation to meet the unmet housing needs in the Black Country. The land is proposed for the development of specialist housing and care facilities for older people or those with disabilities or those with special needs. The provision of a significant number of extra care units would enable the release of a significant number of existing open market houses for re-occupation in Shifnal. These benefits to the housing market in Shifnal area considered to be further exceptional circumstances for the release of this land from the Green Belt.</p> <p>3. Shifnal is considered to be an appropriate location for the proposed development as the largest Key Centre, located on the M54/A5 corridor with key road and rail connections and having experienced significant housing growth over the past several years. This is supported by the Updated Green Belt Topic Paper in Section 9: Shifnal which recognises the role and function of the town.</p> <p>4. The land is considered to be in a strategic location within Shifnal, which infills between the existing Shifnal development boundary (west and south) and land south of Stanton Road proposed to be released from the Green Belt and safeguarded for future development. In terms of sustainability and accessibility, the land is closer to the centre of Shifnal than most of the other suggested allocations and safeguarded land.</p> <p>5. The Draft Plan allocations will exhaust much of the remaining supply of safeguarded land around Shifnal and this land is proposed to help provide further land for the future development needs of Shifnal.</p> <p>6. The provision of extra housing in Shifnal is considered to be necessary because:</p> <ul style="list-style-type: none"> - there is a significant need for specialist housing in Shifnal and east Shropshire where care provision limited but the population has an increasing need for care services. This will also provide a source of local employment through the provision of care services. - the Shifnal Neighbourhood Plan considers the current provision of a single 31 bed care home in Shifnal to be insufficient to meet the needs of the growing population. - further provision has been proposed at The Uplands (permission for 29 self contained apartments) and Stanton Road (60 bed care home) but the proposal at Aston Hall would deliver longer term care home provision within the lifetime of the Plan. - a Care Village requires significant public open spaces which would retain the setting and character of Aston Hall. 	<p>1. & 2. The support for the exceptional circumstances to justify the release of land from the Shropshire Green Belt around Shifnal is welcomed. It is unclear whether this response proposes the land around the south of Aston Hall as an allocation in the Draft Plan to meet the Black Country unmet housing needs or whether the land is proposed as an alternative or additional area of safeguarded land to meet the future development needs of Shifnal. In respect of either outcome, the Council have set out their preferred strategy for development in Shifnal to 2038 in the Submission Draft Local Plan.</p> <p>3. Noted. The support for the designation of Shifnal as a Key Centre is welcomed along with the recognition that the role and function of the settlement also reflects its strategic location on the M54 corridor.</p> <p>4. The land proposed to be safeguarded currently functions as part of the Green Belt closest to the built form of Shifnal along Stanton Road and Coppice Green Lane. The land also functions as part of the grounds and setting to Aston Hall which is a Grade II* listed building [list entry 1308059] dating from around 1720. The Council have considered the need to release land from the Green Belt to meet the current and future development needs of Shifnal including land in this location and other sites have been preferred over this location.</p> <p>5. The Council have identified a further 82.4ha of Green Belt land to be safeguarded for future development in Shifnal. This supplements the 10.4ha of safeguarded land that remains from the SAMDev Plan. The proposed safeguarded land is located to the west, south and east of the town providing a number of future development locations around the town. This includes 14ha of proposed safeguarded land which is located immediately to the south of the land proposed in this representation around Aston Hill. The Council have set out their preferred strategy for safeguarding land for future development in Shifnal beyond 2038 in the Submission Draft Local Plan.</p> <p>6. Noted. The Council have identified sites in Shifnal which are proposed to be developed for housing to 2038. These sites are capable of contributing towards these needs where the market responds to these demands. The Council have already recognised the need for housing to meet demands from older people and those with special needs in Shifnal. An employment site identified in the SAMDev Plan within a proposed mixed use allocation between Stanton Road and Lawton Road has been both relocated/re-used under planning permission 19/00494/REM to deliver the Springwood development providing 70 extra care apartments.</p>	No
A233	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments	Yes	No	<p>1. No further comments, other than to reiterate those comments/concerns previously presented in respect of the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.</p>	<p>1. Noted.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A233	B002	Updated Housing and Employment Topic Paper.	General comments	Yes	No	<p>1. Welcome transparency of identifying specific sites to accommodate housing and employment land contributions to the Black Country.</p> <p>2. Note an uplift of 500 dwellings to the housing requirement is proposed, focused on increased settlement housing guidelines and windfall allowances at three locations (Shrewsbury, Whitchurch and the former Ironbridge Power Station). This focus on the urban areas and brownfield site opportunities in sustainable locations is supported.</p> <p>3. Previously raised objection to the Regulation 19: Pre-Submission Draft in relation to the 'hubs and clusters' approach of draft Policy SP2, and the importance of ensuring rural development is limited to meeting local needs.</p>	<p>1-2. Noted.</p> <p>3. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable.</p>	No
A233	B003	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	Yes	<p>1. Welcome the main provisions of the draft policy. Analysis of 2021 Census data indicates Shropshire has an above national average proportion of resident older people and the population is aging, living longer and more independently. There is considerable need for more housing for older people and those with disabilities and special needs (as confirmed in paragraph 1 of the policy explanation, which draws on the SMHA evidence base).</p> <p>2. Endorse the principle that wherever possible, the priority will focus on independent living within existing homes in existing communities. As such, provision of accessible and adaptable housing and appropriate forms of specialist housing (outlined at part 1 of the draft policy) is fully supported. Also consider the ability for older people to transition into specialist housing at an appropriate time can free-up other housing and contribute to the housing supply for other groups such as families thereby supporting a more flexible housing market.</p> <p>3. Consider that the objectives of the policy can only be met if appropriate funding and resources are committed.</p> <p>4. Welcome paragraphs 9 and 10 of the draft Policy, it is essential that specialist housing is integrated into existing (and emerging) communities and is well connected in terms of access to shops, community facilities and other services appropriate to the needs of future occupiers. Also recognise the vital importance of delivering specialist housing in multi-generational, integrated and inclusive communities.</p> <p>5. Consider paragraph 11 of the policy should be strengthened to ensure the delivery of key worker accommodation for associated care staff. The success of the draft policy is dependent on appropriate staffing of specialist housing.</p> <p>6. Recognise that specialist housing can perform an employment role on mixed use employment sites (as per paragraph 14), but only where the requirements of paragraphs 9 and 10 are met.</p> <p>7. Adoption of a 'sliding scale' for development site thresholds of provision, as set out at paragraphs 15 – 17 of the draft policy is fully supported.</p> <p>8. Given the predominantly rural character of Shropshire, the fact that many sites are smaller in rural settlements and the stated objective to retain people within their own communities where possible, concerned to understand how a proportionate level of provision of appropriate forms of specialist housing can be secured on smaller sites.</p>	<p>1-4 and 6-7. Noted.</p> <p>5. Paragraph 11 of the draft policy is considered complementary to other mechanisms within the draft Shropshire Local Plan which seek to ensure the provision of housing appropriate for key workers. This includes draft Policy DP1 which addresses the size and mix of dwellings and draft policies DP3-DP7 which address the various mechanisms to deliver affordable housing in Shropshire.</p> <p>8. The wider policy requirements in this draft policy identify other mechanisms which aim to deliver specialist housing, including within more rural communities.</p>	No
A233	B004	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	Yes	<p>1. See A233 B003.</p>	<p>1. See response to A233 B003.</p>	No
A234	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3	Yes	Yes	<p>1. Note the draft Shropshire Local Plan recommends that sites at Tasley, Shrewsbury and the former Ironbridge Power Station have sufficient capacity to accommodate further housing.</p> <p>2. Concerned about promotion of sites P36A and P36B which were considered inappropriate for development in the site assessment. These sites are in the Green Belt and are agricultural fields.</p>	<p>1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A234	B002	Updated Housing and Employment Topic Paper.	Paragraphs 7.63-7.64, 8.7-8.8, 16.64 and Tables 8.1 and 8.3	Yes	Yes	1. Substantial development has been undertaken/planned in Albrighton (over 770 homes), this is a massive commitment in the draft Shropshire Local Plan and is/will place a burden on infrastructure. It also identifies three suitable areas of safeguarded land for development post 2038. The infrastructure would be unable to bear any further development (reference to Boningale Homes proposal), which would destroy the character of the village. Employment provision should be at Cosford.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A234	B003	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13	Yes	Yes	1. The draft Shropshire Local Plan encourages sustainable growth and protects irreplaceable assets. It includes a significant build programme on appropriately located sites to meet the needs of Albrighton to 2038 and safeguarded land for development beyond this period (any speculative proposals before then on the safeguarded land should be refused). Speculative proposals in the Green Belt such as at P36A and P36B should also be refused. 2. Appropriate sites have been identified to accommodate proposed contributions to the Black Country.	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A235	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 12.4 and Appendix 3	Yes	Yes	1. Support the draft Shropshire Local Plan. Consider a large scale development will destroy the community.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A236	B001	Updated Green Belt Topic Paper.	Paragraphs 5.25, 5.27, 6.4, 6.8 and 6.13	Yes	Yes	1. Support the draft Shropshire Local Plan as it protects the Green Belt which is important for health and wellbeing. Concerned about the Boningale Homes proposals for development in the Green Belt at Albrighton - this and other proposals contrary to the draft Shropshire Local Plan should be refused.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A237	B001	Updated Green Belt Topic Paper.	Paragraphs 5.25, 5.27, 6.4, 6.5, 6.8 and 6.13	Yes	Yes	1. Support the draft Shropshire Local Plan as it protects the Green Belt. Concerned about the Boningale Homes proposals, which will result in loss of Green Belt and overwhelm infrastructure, it should be refused.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A238	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the Additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65, and Tables 8.1 and 8.3 of the Updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8, and 6.13 of the Updated Green Belt Topic Paper.	Yes	Yes	1. The draft Shropshire Local Plan is comprehensive, complies with national policy and was informed by comprehensive consultation (including with neighbouring areas). It identifies areas for future development, helps ensure local and regional housing needs are met to 2039, includes protection of the environment and Green Belt (essential during a climate crisis), and ensures communities are not over-expanded. Development contrary to this plan should be refused (particularly proposals by Boningale Homes at Albrighton). 2. Agree proposed contributions to the Black Country should be accommodated at sites in Shrewsbury, Tasley and the Former Ironbridge Power Station site. 3. Proposals for Albrighton total more than 500 dwellings, including two proposed allocations (ALB017&ALB021) and ongoing development. No further sites should be made available at the village (particularly in the Green Belt or to accommodate contributions to the Black Country), as it will spoil its character, lose the community feel, negatively affect roads and undermine the village centre	1-3 Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A239	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the Additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65, and Tables 8.1 and 8.3 of the Updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8, and 6.13 of the Updated Green Belt Topic Paper.	Yes	Yes	<p>1. The draft Shropshire Local Plan is comprehensive, complies with national policy and was informed by comprehensive consultation (including with neighbouring areas). It identifies areas for future development, helps ensure local and regional housing needs are met to 2039, includes protection of the environment and Green Belt (essential during a climate crisis), and ensures communities are not over-expanded. Development contrary to this plan should be refused (particularly proposals by Boningale Homes at Albrighton).</p> <p>2. Agree proposed contributions to the Black Country should be accommodated at sites in Shrewsbury, Tasley and the Former Ironbridge Power Station site.</p> <p>3. Proposals for Albrighton total more than 500 dwellings, including two proposed allocations (ALB017&ALB021) and ongoing development. No further sites should be made available at the village (particularly in the Green Belt or to accommodate contributions to the Black Country), as it will spoil its character, lose the community feel, negatively affect roads and undermine the village centre</p>	1-3 Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A240	B001	Updated Housing and Employment Topic Paper.	Paragraphs 8.7-8.8 and 16.64	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it is important to minimise urban creep; protect the countryside, sense of community and wellbeing; and consider it is essential to preserve the character of Albrighton. Employment should be directed to RAF Cosford, as large scale employment is not required at Albrighton (RAF Cosford is accessible and the village is blessed with many small employers).</p>	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A241	B001	Updated Housing and Employment Topic Paper.	Table 9.1	Yes	No	<p>1. Bridgnorth is an unsuitable location to accommodate contributions to the Black Country. It is unsustainable to commute between them and there is no evidence incoming migrants would switch to local employment - supported by habits of current residents formerly from the Black Country (so negatively effecting SA objectives 5 and 6). Housing to meet Black Country needs should be located near the main transport links – the M54 and the rail network.</p> <p>2. Note reference to benefits of strong road links between Bridgnorth and the Black Country via the A454 are referenced numerous times, including with regard to proposed allocation BRD030. This is incorrect, transport connectivity between the two areas is actually poor, as acknowledged in the employment section of the Housing and Employment Topic Paper. The A454 is single carriageway and already suffers from congestion at peak times. It passes through several miles of residential area at Wolverhampton before reaching the ring-road and access at Bridgnorth is either via the steep Hermitage Hill or two roundabouts linked by the road past Stanmore Industrial Estate.</p> <p>3. There are no rail links and public transport is limited between Bridgnorth and the Black Country.</p>	1-3. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper. 1-3. Shropshire Council considers that the A454 and A458 linking Bridgnorth to Wolverhampton and Dudley respectively constitute strong road links. However, Shropshire Council considers it is important to note that there is a distinction between consideration of locations to accommodate proposed employment land contributions to the Black Country, which are to support commuters from the Black Country into Shropshire and must be attractive to employers from the Black Country; and consideration of locations to accommodate proposed housing contributions to the Black Country, which are intended to support increased migration from the Black Country where these migrants have the opportunity to access local employment.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A241	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Appendix 4	Yes	No	<p>1. BRD030 is a large greenfield site, development of which would have a negative impact on the environment, and the quality of life of residents. It will also cause serious local issues due to increased traffic, with an impact on quality of life, air quality, and local journey times. These issues have not been considered.</p> <p>-The housing is well beyond a reasonable walking distance of the town centre and the suggested footbridge is unlikely to encourage walking (particularly amongst the elderly or those with mobility problems), leading to increased traffic (and associated noise and pollution) on already congested roads.</p> <p>-Car journeys will result from accessing employment at the Black Country and Telford.</p>	<p>1. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p> <p>1. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p>	No
A242	B001	General comments	General comments	Not Specified	No	<p>1. Strongly oppose development on the Cleckars (ALV009) site in the Green Belt at Alveley. This would be a disgraceful destruction of countryside and access off the main road would be dangerous.</p> <p>2. The village already has ample sports facilities.</p> <p>3. The doctors is due to close in 6 months.</p>	<p>1-3. No specific changes are proposed to the proposed strategy for Alveley as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p>	No
A243	B001	Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8	Yes	Yes	<p>1. Support the draft Shropshire Local Plan. Do not want loss of Green Belt due to additional development.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A244	B001	Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.21-5.27 and 6.4-6.8	Yes	Yes	<p>1. Support the draft Shropshire Local Plan. Concerned with the impact development can have on habitats, biodiversity, flooding and the community.</p> <p>2. There are extensive areas of brownfield land which should be developed in the Black Country.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p> <p>2. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A245	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	Housing and Employment Land Requirements	Not Specified	No	<p>1. The submission version of the draft Shropshire Local Plan included a housing requirement based on a 15% uplift to local housing need; a 1,500 dwelling contribution to the Black Country; an employment land requirement of 300ha; a 30ha contribution to the Black Country; and an urban focused strategy. Through this additional work, it is now proposed that the housing requirement is 31,300 dwellings, including a 1,500 dwelling contribution to the Black Country; an employment land requirement of 300ha, including a 30ha contribution to the Black Country; and an urban focused strategy. The net requirement is a 1,000 dwelling reduction to the proposed housing requirement and a 10ha reduction to the employment land requirement. This is unjustified and is intended to suppress the housing and employment land requirements and avoid the need to identify additional sites. To remain consistent with the submission plan, an uplift of at least 1,500 dwellings and 30ha employment land should be incorporated for the removal of the 1,500 dwellings and 30ha employment land which are now separately justified as a contribution to Black Country. As such, the housing requirement should be 32,300 (30,800 plus 1,500) dwellings and the employment land requirement 330ha (300 plus 30).</p> <p>2. Given the duration of the Examination the housing requirement is likely to cover a period of 13 or 14 years from adoption. This conflicts with paragraph 22 of the NPPF which states "Strategic policies should look ahead over a minimum 15 year period from adoption".</p> <p>3. The Council considers "two reasonable alternatives" for contributing to the Black Country 'No Contribution' and '1,500 dwellings'/'30ha employment land'. No alternative higher contributions are evaluated, even if only to confirm any negative affects. This is unexplained as is why a higher level of contribution cannot be accommodated within Shropshire without harm (or indeed providing benefits).</p> <p>4. Object to the proposed approach to accommodating the uplift to the housing and employment land requirements (through settlement guidelines and windfall allowances).</p> <p>-For housing, increasing reliance on windfalls moves such provision to unsustainable levels; fails to plan; and provides no assurances the additional growth will be delivered. Consider additional sites should be allocated, including specifically at Shrewsbury, where sustainable sites are being promoted - such as land at Weir Hill.</p> <p>-For employment, allocations should be made to ensure growth is directed to match housing growth locations. Unclear why the minimum level of employment allocation was sound on submission due to supply, but now the allocation has increased (eating into that supply), it remains sound - recognise supply exceeds the requirement, but this over-supply was previously considered sound and it remains important to provide choice and competition.</p> <p>5. Sites identified to accommodate the 1,500 dwelling and 30ha employment land contributions to the Black Country are proposed allocations which were until now meeting the needs of Shropshire. It is essential that additional allocations are identified to replace the re-directed dwellings.</p>	<p>1. As the respondent has recognised, the submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p> <p>2. Shropshire Council considers the proposed plan period addressed within the draft Shropshire Local Plan is appropriate. Importantly:</p> <p>-There is nothing in law requiring a Local Plan to have a minimum 15 year period from adoption.</p> <p>-The National Planning Policy Framework (NPPF) preference for a minimum 15 year period from adoption (paragraph 22) is not a mandatory requirement and shorter timescales can be sound, as established in other Local Plan examinations. The Council considers the primary intention of this preference is to ensure plans are forward-thinking; provide a long-term vision, strategy and basis for sound decision making; and do not unduly restrict growth. This is the case in the draft Shropshire Local Plan, with a spatial strategy underpinned by the principle of 'high-growth'.</p> <p>-The National Planning Practice Guidance (NPPG) on Plan Making addresses the plan period at paragraph 64, indicating that the focus is on ensuring that policies are 'forward thinking' and look over a minimum 15 year period. Again, this is the case in the draft Shropshire Local Plan which addresses a 22 year period and has since submission formed a material consideration in decision making.</p> <p>-The proposed plan period continues to align with that of the latter Regulation 18 and Regulation 19 consultations and crucially the submission version of the draft Shropshire Local Plan.</p> <p>-The proposed plan period aligns with the timescales for the proposed vision, objectives, policy framework and settlement strategies within the submission version of the draft Shropshire Local Plan.</p> <p>-The proposed plan period supports the continuation of the spatial strategy proposed within the submission version of the draft Shropshire Local Plan - consistent with the proposed retention of the 1,500 dwelling contribution towards the unmet housing need forecast to arise in the Black Country and the continuation of the 'high-growth' principle that underpins the spatial strategy.</p> <p>-This approach is a pragmatic response to the numerous factors that have had implications for the timescales of the plan making process and meant that adoption of the draft Shropshire Local Plan has not occurred when envisaged by the Council - which would have allowed for more than 15 years remaining within the plan period at adoption. In particular:</p> <p>>The Covid 19 pandemic which due to necessary measures to safeguard communities had led to direct delays at key stages in the plan making process; had significant implications on Council resources in order to support the response to the Covid 19 pandemic, leading to delays to the plan making process; and resulted in a specific extension to the timescales for the Regulation 19 consultation.</p> <p>>A number of lengthy and complex objections which required due consideration through the Regulation 19 consultation process and during</p>	No

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							<p>the ongoing examination processes. This includes a Pre-Action Protocol letter which had a specific implication for the timescales of the examination.</p> <p>-This approach is also a pragmatic approach to avoiding the 'cycle' of examination timescales leading to extensions to plan periods, leading to extension of examination timescales.</p> <p>-This approach is also a pragmatic approach to seeking to positively progress the examination and adoption of the draft Shropshire Local Plan in order to facilitate implementation of the sustainable spatial strategy underpinned by the principle of 'high-growth'.</p> <p>-This approach positively responds to the requirement to review Local Plans every five years.</p> <p>Examples of other circumstances where such an approach has been employed include:</p> <p>-The Hart Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraph 32 of their report (published on 10th February 2020), stating: "There has been some suggestion that the Plan period should be extended. The Plan looks forward 13 years after anticipated adoption, which is below the preferred 15 year time period set out in Paragraph 157 of the NPPF. However, the NPPF's preference is not a set requirement and I consider 13 years to be an appropriate time scale in this instance, particularly as there is now a requirement to review plans every five years." Although the NPPF has been revised since the report, Shropshire Council is of the view that the wording relating to the 15 year time period remain largely unchanged.</p> <p>-The Worthing Local Plan, where the Inspector makes specific reference to the issue of the Plan period within paragraphs 74-76 of their report (published on 14th October 2022), stating "Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption. As submitted, the Plan period runs from 2020 to 2036. It was anticipated that the Plan would be adopted in 2021 and thus would have met this requirement. The Plan has been prepared during the COVID-19 pandemic, which has had understandable consequences in terms of the preparation and submission of the Plan. This means that the Plan will now be adopted in 2022 and will thus have a lifespan of around 14 years. Although the period will now fall marginally short of the 15 years recommended by the NPPF, I conclude that this does not render it unsound. Delaying the adoption of the plan to address any implications for extending the period would be more likely to frustrate, rather than accelerate the delivery of new housing and employment in Worthing. This would be contrary to the Government's objective of significantly boosting the supply of housing and for Councils to have up-to-date plans in place. On balance, a plan period of up to 2036 would remain broadly consistent with the aims of paragraph 22 of the NPPF in allowing adequate time for the Plan's strategic policies to take effect."</p> <p>3. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within</p>	

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							<p>the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>4. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing and employment land requirement are both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing and employment land requirements.</p> <p>5. As the respondent has recognised, the submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p>	
A245	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	Housing Land Supply	Not Specified	No	<p>1. given the requirements of paragraph 76 of the National Planning Policy Framework (NPPF), if the draft Shropshire Local Plan is adopted and a five year supply identified, a further five year supply will not need to be identified for five years.</p> <p>2. Have concerns about a number of sites identified as deliverable within the housing land supply identified by the Council. These in-principle concerns are:</p> <ul style="list-style-type: none"> -The amount of delivery required across all the sites in the five year supply are unrealistic, equating to (1,953 dwellings per annum). -The housing requirement within the adopted Development Plan is not on course to be delivered, demonstrating the Council has a history of over-estimating housing delivery. -For major development sites without detailed Planning Permission the burden on demonstrating sites are deliverable lies with the Council. There is insufficient evidence to demonstrate that this is the case for many components of the supply. -Standard assumptions on build rates and lead-in times have remain unchanged for some time (with no adjustment for Covid or the cost of living crisis which have impacted on them). This is particularly relevant for larger sites in the supply where no delivery has occurred. -The updated NPPF and National Planning Practice Guidance (NPPG) clarifies the approach to be taken for major sites. On the face of it, there is no evidence to support the Council's 10% lapse rate for major sites. Each such site should be assessed individually and 'should only be considered deliverable where there is 	<p>1-5. Shropshire Council considers that the assessment of housing land supply summarised within the Housing and Employment Topic paper is robust. A more detailed explanation of this assessment and the components of the identified housing land supply is provided within GC47: Five Year Housing Land Supply Assessment (2023 base date). The Council welcomes consideration of this supply through the examination process.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						<p>clear evidence that housing completions will begin on within five years'. As such, evidence should be site specific and lapse rates should not be relied upon where possible.</p> <p>3. Comments on specific components of the housing land supply are:</p> <ul style="list-style-type: none"> -A number of non-major sites with Planning Permission have long-standing permissions and are likely to have stalled. Meaning there is clear evidence of non-delivery. -A number of non-major sites with outline planning permission have unrealistic lead-in times and the only evidence is from the site promoter. -Agree with the approach to sites with prior-approval. -Agree with the approach to sites with a resolution to grant planning permission. -Existing allocations are long-standing and have not yet come forward for development. Some have had enabling works/earlier phases implemented but no progress on them (some are associated with developments where earlier phases need to be built at unrealistic rates/timescales). Others are simply promoted through the plan making process. This does not represent clear evidence of deliverability. -Proposed allocations are included on the basis they have been 'actively promoted through the allocation process'; promoters agree with the Council's delivery assumptions; or promoters have confirmed they can come forward in line with the draft Shropshire Local Plan development guidelines (or similar), rather than because there is clear evidence there is a realistic prospect of delivering housing in the next five years. -SLAA sites are windfall sites and as such double counted with the windfall allowance. These site are not a significant component of supply, but troubling they are included. Often included as there is a 'willing landowner' or 'have been submitted through the call for sites process', but no evidence they are deliverable. -Affordable housing is again not a significant component of the supply. These also constitute windfall. No evidence of delivery except where planning permission has been granted post supply period, these should be counted in the next years supply. -Windfall sites - have 'in-principle' concerns over including a windfall allowance in a 5 year supply as by definition these are unknown sites so at odds with paragraph 77 of the NPPF; they do not have planning permission and have not been allocated in an adopted Development Plan and any 'specific' site would need to be supported by clear evidence that they are deliverable; and reference to windfall sites is in the identifying land for homes section and not the maintaining supply and delivery section of the NPPF, so does not support inclusion of such an allowance in the five year supply. The justification for windfall is reliant solely on past trends and not future trends, contrary to the NPPF. There is also an overlap between this allowance and other components of the supply. <p>4. There has been significant reliance on windfall in recent years (and despite this the housing requirement within the adopted Development Plan will fail to be delivered). This failure to plan sufficiently to deliver homes needed in Shropshire points to a need to approve more unknown windfall sites to maintain and increase delivery, rather than relying on a properly plan-led system.</p> <p>5. There is only a 3,574 home buffer (around 10%) above the minimum emerging housing requirement of 31,300 homes across the 22 year Plan period. Of the identified supply, 3,588 are on unknown windfall sites, 622 on SLAA sites and 274 on affordable sites. This calls into question the validity of, and reliance on, the 10% flexibility suggested by the Council. Given history of under-delivery likely to result in a failure to deliver much needed homes.</p>		

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A246	B001	Updated Green Belt Topic Paper.	Paragraph 7.5	Not Specified	No	1. There is an anomaly/misleading information regarding sites ALV006&ALV007 in paragraph 7.5. Latest proposals are the sale of the entirety of this land to fund improvements to the social club and village hall on the existing site. This would increase the capacity of ALB006&ALV007 to 80-90 dwellings, a disaster for this site.	1. No specific changes are proposed to the proposed strategy for Alveley as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.	No
A247	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the Additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65, and Tables 8.1 and 8.3 of the Updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8, and 6.13 of the Updated Green Belt Topic Paper.	Yes	Yes	1. Support the draft Shropshire Local Plan as it is a positive document which clearly identifies areas for development now and in the future, providing for future housing needs of Shropshire. It has been formulated following consultation with the community and adjoining areas. Particularly support the robust protection of the Green Belt at Albrighton (important farming land; important environmental asset (particularly key due to climate change and the lack of biodiversity in Shropshire) and a resource which encourages a sense of well being and supports good mental health). Sites contrary to the plan should be refused. 2. Significant development has occurred in Albrighton over recent years and two further sites are proposed for allocation in the draft Shropshire Local Plan - this development must be carefully considered, infrastructure provided first, and phased in order to preserve the status as a village. Also support identification of safeguarded land for development post 2038, but this must not be Green Belt land. No further sites are required in the village until 2038 (particularly in the Green Belt). 3. Particularly concerned about proposals for 800 homes by Boningale Homes (P36A and P36B), which would change the character of the village; undermine infrastructure (note the Millfield development did not deliver all proposed community infrastructure and concerned the same would occur on this larger proposal) and cause significant traffic problems. Sites P36A and P36B have been assessed and it was concluded they should not be developed. In the unlikely event of the development proving a supermarket this would have an adverse effect on local shops. Provision of employment alone (if delivered) does not mitigate environmental/community impact. They should remain in the Green Belt and agricultural land. 4. Agree the former Ironbridge Power Station is an ideal location to accommodate proposed contributions to the Black Country. Albrighton is not the correct location for such contributions. However, there is no shortage of brownfield sites in the Black Country.	1-4. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

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A248	B001	Updated Housing and Employment Topic Paper.	Paragraph 8.7	Yes	No	<p>1. Support the proposed high-growth approach to the housing requirement and the associated 500 dwelling uplift to the housing requirement.</p> <p>2. Query if housing guidelines for settlements are achievable. This is particularly relevant for in Gobowen where the guidelines is high, one of the existing allocation GOB012 has had no application upon it and contraction of the settlement boundary reduced scope for windfall development - consider the current development boundary should be retained increasing capacity for windfall development. Thus, there appears an evident shortfall against target numbers and delivery. Promotion of a site at Gobowen for 80 dwellings, which is currently in the development boundary but proposal is for it to be removed. Site plan and plans comparing development boundaries accompany the response. Recognise it is in flood zone 3, but working with specialist flood risk consultant to undertake detailed modelling of the site and challenge the zoning. Recent development on nearby land has seen site specific assessments accurately assess the flood constraint and allow planning consent to be obtained.</p> <p>3. Consider reliance on windfall makes soundness of the plan questionable.</p>	<p>1. Noted.</p> <p>2 and 3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>2. Shropshire Council considers that the proposed development strategy for Gobowen is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p>	No
A249	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	<p>Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the Additional Sustainability Appraisal.</p> <p>Paragraphs 7.63-7.64, 8.7-8.8, 16.64-16.65, and Tables 8.1 and 8.3 of the Updated Housing and Employment Topic Paper.</p> <p>Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8, and 6.13 of the Updated Green Belt Topic Paper.</p>	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it is a positive document that is compliant with national policy and informed by consultation with the community and with wider west midlands. It clearly identifies areas for development now and in the future, maintaining control over the locations and densities of new developments, and providing for future housing needs of Shropshire to 2038 and beyond. Also support the protection of the Green Belt at Albrighton, which is crucial to maintain important farming areas, village character, the natural landscape, biodiversity, and environmental sustainability (especially given the Climate Emergency). Any proposals for development on green fields or the Green Belt not in the plan should be firmly rejected.</p> <p>2. Sites P36A and P36B has been assessed and it was determined they should not be development. Consider these sites are unsuitable for development as they are essential green fields, important for agriculture, are of significant value to the local community, their development would be detrimental to nearby listed buildings and conservation area, their development would fragment the village, their development would have a significant traffic impact, and are part of the Green Belt. There are already sufficient locations for development identified at the village.</p> <p>3. Support the proposed 500 dwelling increase to the housing requirement, which demonstrates a balanced approach to housing development.</p> <p>4. New housing at Albrighton should be directed to existing and proposed allocations (ALB017&ALB021), which should be phased. New employment should be directed to RAF Cosford and smaller ad hoc sites. Support the identification of three areas of safeguarded land, for development after 2038. Sites in the Green Belt (particularly P36A and P36B) must not be developed.</p> <p>5. Agree there are sites beyond Albrighton suitable to accommodate proposed contributions to the Black Country. Albrighton is not the correct location for such contributions.</p>	<p>1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A250	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper	REASONABLE OPTIONS FOR CONTRIBUTING TO THE UNMET HOUSING NEEDS AND REASONABLE OPTIONS FOR HOUIING GROWTH FORECAST TO ARISE IN THE BLACK COUNTRY	Yes	No	<p>1. Housing Requirement (31,300) is not sound (positively prepared and justified) as the revised SA did not assess any higher options than option 3b (High Growth + 1500 dwelling BC contribution). While a contribution of 1,500 dwellings towards the unmet need is the most suitable option, there is no assessment of this being the most suitable scale of contribution (i.e. more dwellings given the scale of the unmet need); no alternative scenarios are tested and therefore an informed, evidence based and justified decision cannot be made by the Council.</p> <p>2. The mechanism to review Shropshire's continuation to the Black Country has not been agreed via the SoCG, and this should be revisited. Note that the Raby Estate is promoting two omission sites for development in the draft Local Plan: the proposed new settlement of Beslow New Town (site ref: BWU001) and the Land at Shore Lane, in the village of Cressage (site ref: CES002). These sites are available for development immediately (subject to achieving the necessary planning permissions) and (if progressed) will make a significant contribution to both Shropshire and the Black Country's housing need. The reps include detailed site promotional material regarding these sites.</p>	<p>1-2. Shropshire Council considers that the assessment of reasonable housing and employment land requirement options within the additional Sustainability Appraisal (SA) is consistent with the expectations of the Planning Inspectors with ID28 and ID36. Before undertaking this assessment work, the Council sought further clarification from the Inspectors regarding the scope of this assessment work and received this within ID37.</p> <p>Paragraph 5.7 of ID37 stated "What the SA should do is test options based on the 2020 baseline with 2 extra years, but only look at the growth options tested in the original SA, so a 5, 10 and 15% uplift and look at this with the Black Country unmet needs of 1,500 homes and without it. The results of the SA should then be used to assess what is an appropriate housing requirement in the Plan. The Plan should then make clear what the housing requirement for Shropshire is and how much of the Black Country unmet needs are being accommodated in the Plan. This should be included in Policy SP2 as well as the explanatory text which will need modifying accordingly." (paragraph 5.8 of ID37 then indicated the expectation of a similar approach for employment).</p> <p>Paragraph 6.5 of ID37 then stated "What is important is that further SA work is robust, tests different levels of growth (including with and without the Black Country unmet needs). For consistency and clarity these should be the same growth options as the original SA. The housing requirement is a matter for the Council, informed by the new work set out in paragraph 5.7 above."</p> <p>Shropshire Council considers that the assessment of reasonable housing and employment land requirement options within the additional SA; the subsequent planning judgement exercise summarised within the Housing and Employment Topic Paper and the proposed modifications to the draft Shropshire Local Plan to reflect the conclusions of this process are legally compliant and sound. In addition, no objection has been received from any of the four Black Country Authorities to this consultation, and therefore the 1500 dwelling contribution remains the agreed position. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p>	No
A250	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper	REASONABLE OPTIONS FOR ACCOMMODATING THE UPLIFT TO THE PROPOSED HOUSING REQUIREMENT	Yes	No	<p>1. Reliance upon windfall development to support the additional 500 dwellings is not sound (positively planned and justified). There is a no evidence presented that there is sufficient windfall sites likely to come forward, and proposal is based on trend based assessments against the current plan, which is less constraining. As such a greater buffer should be built into the housing requirement to account for those dwellings that wont come forward during the plan period. Allocating additional sites can accommodate this - Option 3 in the SA would do this and therefore should be preferred. To assist, Raby Estates' site at Beslow (BWU001), subject to securing planning permission, is available for immediate development and is unconstrained by technical and policy constraints .</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No

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A250	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper	SITES TO ACCOMMODATE THE PROPOSED 1500 DWELLING CONTRIBUTION TO THE BLACK COUNTRY	Yes	No	<p>1. The conclusions using internal migration patterns and commuting patterns are overgeneralised and concludes that the whole of the Shrewsbury Place Plan area is identified as a 'reasonable geography' for accommodating the BC need. This is an inappropriate assumption. Council's inclusion of SHR160/158/161 to accommodate a proportion of the 1500 dwellings should be reconsidered, as this is more appropriate for Shropshire's needs rather than BC needs. Unclear about why several sites have been chosen for this purpose.</p> <p>2. Beslow is in a suitable location to accommodate the BC unmet needs as it is in the eastern part of the Shrewsbury Place Plan area. This has more of a functional relationship with the BC compared to SHR160/158/161.</p> <p>3. Beslow is well located to be considered a an allocation , or reserve site (if required) to meet unmet need from the BC, and has already been considered within the consultation of the Local Plan. Details of this omission site promotion are in Section 3 of the Reps.</p>	1-3. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper. The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Shropshire Council considers that this is an appropriate assessment geography within which reasonable options for accommodating contributions to the Black Country will be located. Notably the Inspectors identified that they were content with the approach take to identify an appropriate assessment geography within ID37.	No
A250	B004	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper	STRATEGIC DISTRIBUTION AND SPATIAL STRATEGY	Yes	No	<p>1. The Urban Focus approach lacks an awareness of the rural nature of Shropshire and the requirement to balance development throughout the county to promote sustainable growth in rural areas, and restricts growth in these areas.</p> <p>2. To ensure balanced growth the strategy should focus on a need to find new strategic sites outside the green belt to account for the housing requirement of Shropshire and the unmet needs of the Black Country. Note that the Reps include sections relating to site promotional material for Beslow New Town and Land at Shore Lane, Cressage</p>	1 and 2. The updated SA has reassessed the distribution of growth options as considered at the earlier Reg 18 Issues and options Stage, in the context of the new housing and employment requirement options, and again considers the urban growth option to be the most sustainable option. Urban Focus still allows for a proportion of growth to be directed to the rural areas as the draft Local Plan clearly sets out.	No
A251	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13	Yes	Yes	<p>1. The draft Shropshire Local Plan protects the environment, green spaces and Green Belt at Albrighton, which is essential (vital to manage pollution, provision of play spaces for children, and health and wellbeing to during the Climate emergency). Development in these locations must be refused.</p> <p>2. New housing at Albrighton should be built on existing and proposed allocations (ALB017&ALB021), which must be phased to ensure the community character and infrastructure is retained/not overwhelmed. New employment at Albrighton should be directed to RAF Cosford and small ad hoc sites. Support identification of three areas of safeguarded land for development after 2038. Development in the Green Belt (particularly at P36A and P36B) must be refused.</p>	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A252	B001	Draft Policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.		Not Specified	No	<p>1. The Draft Policy on Housing Provision for Older People and those with Disabilities and Special Needs is not sound because it is not justified, effective or consistent with national policy and consequently it is contrary to NPPF paragraph 35(b),(c) & (d).</p> <p>2. The Draft Policy responds to ID28 paragraph 40 by providing a specific policy to deal with specialist housing and this implements the findings of the Shropshire SHMA to meet the identified need for specialist older persons housing (3,500 units) and the identified need for residential care provision (2,500 units). This is achieved by targeting sites with a capacity of 50+dws in a tiered approach where each higher tiers requires a higher percentage provision of specialist housing. This is considered to be an ineffective way of targeting older peoples housing needs especially for people aged 75+ years. It is therefore recommended that the draft Policy focus on the delivery of M4(2) adaptable homes to support older people to continue their independent lifestyles.</p> <p>3. The Local Plan Delivery and Viability Study has not considered whether the provision of older persons and specialist accommodation would undermine the deliverability of the Local Plan and it is unclear whether the Viability Study will be updated.</p> <p>4. The Viability Study currently sets low benchmark land values in a County where the viability of development is challenging and may support 10% affordable home provision but not 20% as required in Draft Policy DP3. Viability has also</p>	<p>1. Noted.</p> <p>2. - 4. To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken. With regard to the optional building regulations accessible and adaptable housing standards, the proposed standards for general housing are specifically considered within the Whole Plan Viability Assessment. With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes that such housing will be "subject to a viability assessment at the point of a planning application", consistent with national guidance. The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations. However, the Council recognises that viability can vary between the different forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution which is responsive to needs and development viability. It is also important to note that many forms of specialist housing represent high-density development and as such can achieve effective use of land enhancing viability, may also constitute a proportion of the affordable housing contribution, and also represents an additional outlet on the</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						<p>been assessed for the requirement that all homes should be accessible and adaptable and 10% should be wheelchair adaptable. However viability was not assessed for sheltered housing and extra care schemes.</p> <p>5. The tiered approach with the increasing percentage provision in each of the higher tiers has not been substantiated through evidence and there is no assessment to show that these housing contributions will be deliverable. At the lower tier (5-149dws) the 10% requirement would have a low yield of 5-15 units and these schemes may be uneconomical to administer especially where they required more intensive care services. The middle tier (150-249dws) requires 23-37 units which is still at the lower end of likely operator demands. The policy has therefore not justified the expected outcomes of the proposed delivery method.</p> <p>6. The Draft Policy does not respond effectively to the Inspectors requirement to consider the proposed approach to meeting the accommodation needs of older persons households. The proposed amendments are not proportionate, there is little to no justification or supporting evidence for the proposed delivery method, the approach seeks a contribution from every allocation whether the site location and available services are appropriate for older persons and specialist accommodation or whether the site is of a scale to deliver further on-site services or facilities.</p> <p>7. This representation is supported by a briefing note on the matter prepared by Lichfield's entitled Older Persons Housing Need Policy Rebuttal (2023) which concludes that the Council's proposed approach:</p> <ul style="list-style-type: none"> - Fails to acknowledge the fact that not all people aged over 75 and in need of care will choose specialist accommodation to meet their needs, with many likely to remain within their own homes, or look for accommodation earlier in life that is adaptable to meet future care needs (i.e., M4(2)/M4(3)); - Fails to consider whether the provision of older persons and specialist accommodation via the draft Policy's tiered approach, with the differing thresholds and requirements depending on development size, would undermine the deliverability of the Local Plan; - Fails to have any regard to the operational demands of specialist accommodation providers, with the thresholds and requirements likely to result in few, if any, specialist older person accommodation being provided within sites as they lack the critical mass and economies of scale necessary to deliver such development. <p>8. The briefing note recommends the following amendments to the draft Policy to satisfy the soundness tests of NPPF paragraph 35:</p> <ul style="list-style-type: none"> - Part 16 should be deleted, or, alternatively, amended to enable developments between 150-249 dwellings to make an appropriate provision, where the site would be located where future occupiers can benefit from access to existing services and facilities or can make provision for such facilities. In instances where this is not possible, provision can be made through an appropriate provision of M4(3) dwellings; - as a minimum, part 17 of the Draft Policy should be deleted; - Part 17 should be amended to allow for flexibility in circumstances where developments at the lower end of this threshold may not deliver the economies of scale necessary to facilitate the critical mass required to deliver Extra Care or Care Homes. 	<p>scheme, which can increase the sites marker, have positive effects on deliverability, and speed-up timescales - which aligns with Government aspirations.</p> <p>5. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Furthermore, within paragraphs 38-41 ID28 the Inspectors concluded that there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. Reflecting these factors, it is considered appropriate to specify the proportions of specialist housing expected on larger development sites.</p> <p>6. - 8. It is acknowledged that there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such, the Council is proposing a modification to this draft Policy to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies. Furthermore, consistent with the conclusions of the Whole Plan Viability Assessment a modification is proposed to allow the provision of reduced rates of specialist housing provision where it is demonstrated that this is creating viability concerns for otherwise sustainable schemes. Furthermore, it is recognised that there may be circumstances where a specific site is unsuitable for specialist housing or there is no identified need for such housing in the area; as such the Council proposes a modification to this draft Policy to allow for the provision of reduced rates of specialist housing provision where the Council agrees one or both of these circumstances apply.</p>	
A253	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General Comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A254	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.4	Yes	Yes	1. Support the draft Shropshire Local Plan which plans for over 500 houses at Albrighton and allows for organic development. Further development is not required and would have a serious impact on infrastructure (particularly roads with safety implications) and the character of the village.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A255	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.4 and Appendix 3	Yes	Yes	1. Support the draft Shropshire Local Plan as it allows for measured development. We must preserve green spaces/Green Belt. Large development in the Green Belt would over-run the village, infrastructure and community feel. Consider there are more appropriate locations to accommodate development.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A256	B001	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21 and 6.4-6.8	Yes	Yes	1. Support the draft Shropshire Local Plan and not averse to a small amount of development. It is essential that the Green Belt at Albrighton is protected and note that development can increase flood risk off-site.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A257	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General Comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A258	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	The introduction and paragraphs 6.4-6.8 and 12.1-12.3	Yes	Yes	1. The countryside is important for health and wellbeing and wildlife.	1. Noted.	No
A258	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8 and 12.1-12.3	Yes	Yes	1. Crucial to preserve agricultural land and green spaces (important for food production/bio-fuels - particularly given uncertain times and form natural flood/carbon controls) around Albrighton. Loss of Green Belt at Albrighton for development will destroy the community feel and impact on traffic.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A259	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General Comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A260	B001	Updated Housing and Employment Topic Paper.	Paragraphs 8.5-8.7	No	No	1. The proposed approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. The windfall allowances equates to 10% of total development and is not applied equally. In Ruyton XI Towns it is 27% of the housing guideline (excluding completions some of which were windfall). Consider the settlement has little potential for windfall development and could lead to opportunistic applications for exception sites in the countryside. If more housing is required in in Ruyton XI Towns Parish it would be preferable for this to be on identified sites, alternatively the housing guideline could be reduced so the windfall allowance is consistent with the average for Shropshire. 2. Concerned the 10% affordable housing requirement in the north of Shropshire will increase pressure for exception sites in the open countryside. Draft policies DP4-DP7 seek to regulate the location of exceptions sites, but wording could encourage speculative applications.	1. Noted. No specific changes are proposed to the proposed strategy for Ruyton XI Towns as a result of the additional material that was the subject of this consultation. Shropshire Council considers that the proposed development strategy for Ruyton XI Towns is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process. 2. This matter does not relate to the additional material subject to this consultation. Shropshire Council considers the policy expectations for affordable exception sites within draft Policies DP4-DP7 are clear and appropriate.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A261	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.82-12.87	Yes	No	<p>1. The assessment of sites to accommodate proposed contributions to the Black Country considered all sites in the relevant assessment geography. As recognised in paragraph 12.84 of the additional Sustainability Appraisal (SA) it is not surprising sites identified for this purpose are proposed allocations. However, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Therefore, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire.</p> <p>2. There are sites appropriate to meet local needs outside the identified assessment geography associated with higher-tier settlements which would offset the loss of any sites specifically identified to meet the needs of the Black Country, whilst also meeting settlement specific housing requirements. An example is SMH037 at St Martins. St Martins is proposed to be designated as a Community Hub. This site could and should make a significant contribution to this figure as an allocated site rather than relying upon windfall development to accommodate the need.</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p> <p>2. Shropshire Council considers the proposed development strategy for St Martins is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at St Martins have been informed by a proportionate and robust site assessment process.</p>	No
A261	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 10.51-10.52	Yes	No	<p>1. The proposed approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). Consider additional site allocations should be identified to ensure that the Plan is justified, deliverable and effective.</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No
A261	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 6.8	Yes	No	<p>1. Do not consider that no contribution to the Black Country represents a reasonable option given that paragraph 11 of the National Planning Policy Framework (NPPF) references providing for unmet needs in neighbouring areas and ongoing work in the West Midlands illustrates that the shortfall is increasing. Given this, consider an uplift in Shropshire's contribution towards the housing needs of the Black Country (above that proposed in Option 2), rather than Option 1's no contribution should be considered.</p>	<p>1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A261	B004	Updated Housing and Employment Topic Paper.	Paragraph 9.10	Yes	No	<p>1. Sites identified to meet contribution to Black Country needs are proposed allocations which were already included within the submission version Plan. Therefore, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Thus, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire.</p> <p>2. There are sites appropriate to meet local needs associated within higher-tier settlements, in line with the proposed spatial strategy. These would make an appropriate contribution to meeting an uplift in the overall dwelling requirement and offset the loss of sites specifically identified to meet the needs of the Black Country. An example is SMH037 at St Martins. St Martins is proposed to be designated as a Community Hub. This site could and should make a significant contribution to this figure as an allocated site rather than relying upon windfall development to accommodate the need.</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate. It should be noted that the submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan.</p> <p>2. Shropshire Council considers the proposed development strategy for St Martins is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at St Martins have been informed by a proportionate and robust site assessment process.</p>	No
A261	B005	Updated Housing and Employment Topic Paper.	Paragraphs 8.65-8.66	Yes	No	<p>1. The proposed approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). Consider additional site allocations should be identified to ensure that the Plan is justified, deliverable and effective</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No
A261	B006	Updated Housing and Employment Topic Paper.	Paragraph 7.61	Yes	No	<p>1. The Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and resultant uplift is supported. However, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A261	B007	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Table 8.6	Yes	No	1. The Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and resultant uplift is supported. However, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.	No
A262	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 12.4 and Appendix 3	Yes	Yes	1. Do not support development on agricultural land and wish for Albrighton to remain a village.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A263	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.4, Table 12.4 and Appendix 3 of the Additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8 and 16.64-16.65, and Tables 8.1 and 8.3 of the Updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.3-5.27, 6.4-6.8 and 6.13 of the Updated Green Belt Topic Paper.	Yes	Yes	1. Support the draft Shropshire Local Plan as it appears to define current and future allocated areas of housing development in Albrighton, whilst giving protection to the Green Belt land around the village. Consider large scale development (housing, supermarket, secondary school and health centre) would undermine existing shops and services and change the character of the community. 2. Consider Shropshire's housing needs would be better met by developments at Tasley, Shrewsbury and Ironbridge and not on Green Belt land around a small village.	1-2. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A264	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper.	General comments	Yes	No	<p>1. Consider the draft Shropshire Local Plan would benefit from less reliance on windfall employment. The draft Shropshire Local Plan is not positively prepared as it does not seek to meet the identified need for employment but instead relies on unspecified windfall sites. Furthermore, the Council propose that the 20ha uplift to the employment land requirement is accommodated through windfall development, which again means it is not positively prepared or consistent with paragraph 86 of the National Planning Policy Framework (NPPF).</p> <p>2. Consider the draft Shropshire Local Plan would benefit from less reliance on a highly constrained site - SHR166 (the site has become heavily constrained since submission of the plan, with much of the site contains a newly designated Scheduled Monument, which means it will deliver substantially less development). Reliance on this site should be re-evaluated.</p> <p>3. Shrewsbury is the strategic centre of Shropshire and a focus for development. Promotion of a new site (Boretton Grange, Cross Houses, Shrewsbury, Shropshire, SY5 6HT) for employment at Shrewsbury. This site is unconstrained and totals 14.8ha. It could deliver 45,000m2 of employment floorspace on the edge of Shrewsbury in a sustainable location. In the context of the Stage 2a site assessment, it is considered this site would achieve a score of '0' equating to 'good' for overall settlement sustainability conclusion and 'good' for overall Black Country contribution sustainability conclusion, this is better than proposed allocations at Shrewsbury including SHR166 (which scored 'poor'). It has been the subject of a recent pre-application and there are already specific operators interested in the site, so would be delivered in the near future. Allocation of the site would constitute a significant contribution to the 20ha uplift to the employment land requirement and help the plan to be positively prepared and set out a clear economic vision and strategy (in accordance with paragraph 86 of the NPPF. Submission supported by a site plan.</p> <p>4. Support the high growth option, as this has the potential to deliver more economically beneficial outcomes which is particularly relevant to a county with a rising proportion of economically inactive residents.</p> <p>5. Paragraph 7.24 of the Housing and Employment Topic Paper indicates the Council's view that there is a correlation between greater growth and greater economic and social benefits but also greater environmental impact. This is not always the case.</p> <p>6. None of the options considered to accommodate the proposed uplift to the employment land requirement involved additional allocations, this is considered an oversight and would constitute the most sustainable and sound approach.</p>	<p>1, 5 and 6. Shropshire Council considers the proposed mechanism to accommodate the uplift to the employment land requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the employment land requirement. For the avoidance of doubt, one of the options considered involved increasing the capacity of existing proposed allocations and/or opportunities to identify additional site allocations. 2 and 3. Shropshire Council considers that the proposed development strategy for Shrewsbury is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process. Shropshire Council recognises that much of site SHR166 contains a newly designated Scheduled Monument (designated in late 2022). This matter is currently being given due consideration, informed by ongoing engagement with the site promoter. The Council expects for this issue to be considered through the 'stage 2' hearing sessions.</p> <p>4. Noted.</p>	No
A265	B001	Updated Housing and Employment Topic Paper.	Paragraph 7.61	Yes	No	<p>1. The Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and resultant uplift is supported. However, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A265	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Table 8.6	Yes	No	1. The Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and resultant uplift is supported. However, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.	No
A265	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.82-12.87	Yes	No	1. The assessment of sites to accommodate proposed contributions to the Black Country considered all sites in the relevant assessment geography. As recognised in paragraph 12.84 of the additional Sustainability Appraisal (SA) it is not surprising sites identified for this purpose are proposed allocations. However, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Therefore, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire. 2. There are sites appropriate to meet local needs outside the identified assessment geography associated with higher-tier settlements which would offset the loss of any sites specifically identified to meet the needs of the Black Country, whilst also meeting settlement specific housing requirements. Examples of such sites would be sites CLV010, HDL012 and HDL014 as detailed within the Regulation 19 submission.	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate. 2. Shropshire Council considers the proposed development strategies for Clive and Hadnall are appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at Clive and Hadnall have been informed by a proportionate and robust site assessment process.	No
A265	B004	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 10.51-10.52	Yes	No	1. The proposed approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). Consider additional site allocations should be identified to ensure that the Plan is justified, deliverable and effective.	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.	No
A265	B005	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 6.8	Yes	No	1. Do not consider that no contribution to the Black Country represents a reasonable option given that paragraph 11 of the National Planning Policy Framework (NPPF) references providing for unmet needs in neighbouring areas and ongoing work in the West Midlands illustrates that the shortfall is increasing. Given this, consider an uplift in Shropshire's contribution towards the housing needs of the Black Country (above that proposed in Option 2), rather than Option 1's no contribution should be considered.	1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A265	B006	Updated Housing and Employment Topic Paper.	Paragraph 9.10	Yes	No	<p>1. Sites identified to meet contribution to Black Country needs are proposed allocations which were already included within the submission version Plan. Therefore, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Thus, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire.</p> <p>2. There are sites appropriate to meet local needs associated within higher-tier settlements, in line with the proposed spatial strategy. These would make an appropriate contribution to meeting an uplift in the overall dwelling requirement and offset the loss of sites specifically identified to meet the needs of the Black Country. Examples of such sites would be sites CLV010, HDL012 and HDL014 as detailed within the Regulation 19 submission.</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate. It should be noted that the submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan.</p> <p>2. Shropshire Council considers the proposed development strategies for Clive and Hadnall are appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at Clive and Hadnall have been informed by a proportionate and robust site assessment process.</p>	No
A265	B007	Updated Housing and Employment Topic Paper.	Paragraphs 8.65-8.66	Yes	No	<p>1. The proposed approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). Consider additional site allocations should be identified to ensure that the Plan is justified, deliverable and effective</p>	<p>1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A266	B001	Draft Policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Yes	No	<p>1. Draft Policy should be amended to:</p> <ul style="list-style-type: none"> - broaden the reliance on allocated housing sites to bring forward specialist housing to include windfall sites; and - change the threshold requirement for specialist housing provision to include smaller scale sites / smaller proposed development schemes. This would conform with the requirement to provide a choice of housing for older people in National Planning Policy. <p>2. The evidence provided does not justify how the Draft Policy will deliver the required scale of specialist housing to satisfy the strategic objectives of the Draft Plan and the People's Strategy for Shropshire.</p> <p>3. This will specifically affect areas reliant on high levels of windfall especially where the proposed scale of residential development has largely been delivered. This would mean specialist housing in Shifnal might only provide 2% of total housing delivery in the town.</p> <ul style="list-style-type: none"> - a case study of Shifnal allegedly demonstrates this issue: Shifnal's housing guideline is 1,500dws and only 297dws remain to be committed (with 1,187dws built and 16dws with permission). This 297dws comprises three allocated housing sites with capacities below 150dws and with a windfall allowance for 67dws. The Draft Policy requires 10% specialist housing on sites of less than 150dws meaning Shifnal may provide 24 specialist housing units or under 2% of the 1,500dws settlement guideline. <p>4. Proposed amendments to the Draft Policy present two potential options which comprise:</p> <ul style="list-style-type: none"> - Option 1: insert an exceptional provision after Criterion 19, to support proposed developments that deliver more than 20% specialist housing on unallocated sites outside settlements boundaries in Principal and Key Centres. This should require the proposed site to adjoin the settlement boundary and the specialist housing to be less than 5% of the settlement guideline figure. A further Criterion would be required in Policy SP11 indicating the provision of specialist housing was a very special circumstance for development in the Green Belt. A criterion is required in Policy DP10 for housing development in the countryside adjoining a settlement boundary. - Option 2: allocate additional sites for the provision of specialist housing as indicated in Section 3.6 of the Draft Local plan. Shifnal site SHF18a would satisfy this objective where the site provided more than 20% specialist housing and the site was recognised as a housing allocation through a modification to Settlement Policy S15.1 and Schedule S15.1. 	<p>1. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Furthermore, within paragraphs 38-41 ID28 the Inspectors concluded that there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. Reflecting these factors, it is considered appropriate to specify the proportions of specialist housing expected on larger development sites which is almost entirely comprised of allocated housing sites in the Draft Plan and to deliver the necessary certainty, it is proposed not to rely on windfall sites in the delivery of specialist housing.</p> <p>2. & 3. The clear purpose of this policy is to support the achievement of the housing needs of older people and those with disabilities and special needs in a way that aligns with the Council's social care strategy (People's Strategy). Draft Policy DP1 addresses housing mix, with the intention of ensuring smaller housing is delivered to a building format that will facilitate downsizing among the older population who wish to relocate to new housing within the general housing market. The Council have identified sites in Shifnal which are proposed to be developed for housing to 2038. These sites are capable of contributing towards these needs where the market responds to these demands. The Council have already recognised the need for housing to meet demands from older people and those with special needs in Shifnal. An employment site identified in the SAMDev Plan within a proposed mixed use allocation between Stanton Road and Lawton Road has been both relocated/re-used under planning permission 19/00494/REM to deliver the Springwood development providing 70 extra care apartments.</p> <p>4. Noted. The Council have set out their preferred strategy for development to 2038 in Shropshire and Shifnal including the delivery of specialist housing to meet identified needs and this is set out within the Submission Draft Local Plan with Proposed Modifications and supporting evidence documents.</p>	No
A266	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	12.6, 12.7, 12.28, 12.30, 12.42, 12.59, 12.77, 12.78, 12.83 & 12.84.	Yes	No	<p>1. The SA should not assess a 'no contribution' option as an alternative to the propose contribution of 1,500dws and 30ha of employment land towards the Black Country unmet need. Shropshire has agreed to contribute towards these unmet needs through the duty to co-operate process and a reasonable alternative option of 3,000dws and 50ha was identified in EV041.04 - correspondence with City of Wolverhampton Council for the Association of Black Country Authorities with regard to proposals at M54 Junction 3.</p> <p>2. The Options for housing and employment land requirements should therefore have included reasonable options that provided for contributions towards Black Country unmet need of 3,000dws and 50ha above moderate, significant and high growth for Shropshire. The conclusions to uplift the housing and employment requirements is welcomed but other scales of uplift should have been considered.</p> <p>3. The SA should also have considered other options to provide flexibility to respond to changing unmet needs in the Black Country, changing local housing</p>	<p>1. & 2. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>3. & 5. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						<p>needs including more opportunities to deliver affordable housing, specialist housing and support to diversify the labour force. The SA should also have considered the provision of Plan B sites to provide an additional 'flexibility' buffer to changing circumstances in Shropshire and in the Black Country.</p> <p>4. It is considered that the Examining Inspectors ID28 in paragraph 21 directed the Council to increase the housing and employment land requirements and to allocate more sites for development. The SA preferred method of using windfall allowances to accommodate uplifts in the housing and employment land requirements is considered to be a tactic to avoid this direction.</p> <p>5. SA Section 12 in paras 12.6, 12.77 and 12.83 the site assessment process to accommodate Black Country unmet needs is also affected by the decision to accommodate the uplifts to the requirements on windfall sites even though unallocated sites were considered to meet the Black Country unmet needs. SA Section 12 in para 12.84 considers that the robust site assessment process removed the need for further allocations to meet the Black Country unmet needs, but the site assessment process itself failed to take sufficient account of environmental, economic and social factors in identifying locations and sites to contribute to Black Country unmet needs.</p> <p>6. The operation of two separate SA assessments to accommodate the uplift in the overall development requirements and to accommodate the contribution to Black Country unmet need is unsound and has delivered an inappropriate strategy for Shropshire in relation to the strategic approach to housing delivery identified in para 3.6 of Policy SP2 Strategic Approach in the Draft Local Plan.</p> <p>7. The reliance on windfall provision to meet the uplift in the housing requirement will limit the additional provision of specialist housing for older people or those with special needs because the proposed Draft Policy on Specialist Housing (sections 15, 16 and 17) excludes windfall housing as a source of supply. The SLAA (EV106) shows that windfall development provides a significant supply of housing but largely on sites of less than 5 dwellings which is below the 10dw threshold for affordable housing provision in Draft Policy DP3 and to the reliance on windfall development will limit the provision of additional affordable housing.</p> <p>8. Examining inspectors ID28 directed the search for sites that meet Black Country unmet need towards locations close to the Black Country. This required weight to be given to location close to the Black Country but no evidence of any locational weighting can be identified in the SA including paras 12.7 to 12.28 and 12.30 or any sustainability objectives that might provide weight. This should have identified a need to give weight to the proximity and connectivity of Shifnal as a location for housing to meet Black Country needs and to reflect the focus on Shifnal for employment land provision in the Housing and Employment Topic Paper. The Council should also have collaborated with the Black Country Authorities on determining the geographic scope of the site assessment in accordance with NPPF para 72.</p> <p>9. Examining Inspectors indicated that sites to meet Black County needs should be located close to the Black Country. The SA in paras 12.42 to 12.59 and 12.78 should have identified sustainable assessment criteria for professional judgements about the geographic scope of sites to contribute to Black Country unmet needs. This should have compared sites in close proximity to the Black Country including Shifnal with sites further away including Shrewsbury. This omission fails to conform with NPPF advice on undertaking SA.</p> <p>10. The site assessment of SHF018a (referenced incorrectly as SHF037) was not proportionate in concluding there were other more appropriate sites. SHF018a adjoins the proposed employment allocation SHF018b/018d, SHF018a adjoins existing housing around Lamledge Lane and the Hillcrest School community use, SHF018a sits within Stanton Road as a defensible urban boundary and SHF018a better links SHF018b/018d to the urban form of Shifnal. Shifnal is also a more</p>	<p>appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>4. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p> <p>6. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.</p> <p>7. See response to representation on Draft Policy for Specialist Housing.</p> <p>8. & 9. The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Shropshire Council considers that this is an appropriate assessment geography within which reasonable options for accommodating contributions to the Black Country will be located.</p> <p>10. Shropshire Council considers that the proposed development strategy for Shifnal is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p>	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						sustainable location than Shrewsbury to Ironbridge to meet Black County unmet housing need being located closer to the Black Country Authorities.		
A266	B003	Updated Housing and Employment Topic Paper.	General comments	Yes	No	<p>1. To conform with Section 70 of the NPPF, the reliance on windfall sites to deliver the 500dws uplift in the County housing requirement must provide evidence that windfall sites are a reliable source of supply. Figure 8.1 of the Housing and Employment Topic Paper indicates completions on larger sites is declining but small sites of less than 5dws remain consistent. Therefore the plan should place less reliance on windfall sites for housing delivery.</p> <p>2. To conform with NPPF Section 15, the Draft Plan should allocate sites to deliver the uplift of 500dws on the County housing requirement to ensure housing delivery uses a plan led approach. These sites should be located close to the Black Country to help contribute towards their unmet housing needs.</p> <p>3. To conform with NPPF Section 81(a), the Draft Plan should allocate further site(s) for employment use to deliver the uplift of 20ha on the County employment land requirement. This will also address the absence of evidence about windfall employment delivery to justify the proposal to deliver the 20ha uplift from the current employment land supply.</p> <p>4. Meeting 30ha of unmet employment land need from the Black Country in Shifnal requires a balancing provision of housing in close proximity to the employment land. Shifnal requires further housing sites because the residual supply is currently only 300dws and SHF108a should be allocated to fulfil this additional housing provision.</p>	<p>1. - 3. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p> <p>4. Shropshire Council considers that the proposed development strategy for Shifnal is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p>	No
A266	B004	Updated Green Belt Topic Paper.	General comments	Yes	No	<p>1. The principle of releasing Green Belt land around Shifnal is accepted [response does not specify whether this recognises the exceptional circumstances] but an insufficient area of land has been removed from the Green Belt. The circumstances for releasing Green Belt land on sites SHF018b and SHF018d south of Stanton Road also apply to site SHF018a to the north of Stanton Road. This representation seeks the removal of site SHF018a from the Green Belt and the allocation of the land for residential use to contribute towards unmet housing needs in the Black Country.</p>	<p>1. Support for the release of Green Belt land around Shifnal and for the principle/exceptional circumstances for the release of this land is welcomed. Shropshire Council considers that the proposed development strategy for Shifnal is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy).</p>	No
A267	B001	Updated Housing and Employment Topic Paper.	Paragraphs 2.12 and 8.73b	Yes	Yes	<p>1. Support the principle of an additional windfall allowances throughout Shropshire.</p> <p>2. In particular support the additional 75 dwelling windfall allowance at Whitchurch. This is important as the existing allowance has already been exceeded by 55 dwellings, allowing no further capacity for windfall development in a Principal Centre.</p> <p>3. Note parties may suggest that there is no windfall capacity in Whitchurch, however response promotes a site at Linden Court, Tarporley Road which is within the proposed settlement boundary and will come forwards as windfall development. It is around 2.4ha and is available, capable of immediate development and is deliverable. A developer is associated with the site which has been the subject of a pre-application (response attached to submission), which in summary concludes once the draft Shropshire Local Plan is adopted, the land will sit within the settlement boundary of Whitchurch where the principle of development would be acceptable; and the proposed layout housing mix and housing density to include 35 dwellings would '...appear appropriate' (site plan and layout attached to submission) - with an alternative proposal for 30 dwellings prepared which responds to detailed comments. Consider other issues raised can be dealt with through the Planning Application.</p>	<p>1. Noted.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A268	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A269	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the Additional Sustainability Appraisal. Paragraphs 7.63-7.64, 8.7-8.8 and 16.64-16.65, and Tables 8.1 and 8.3 of the Updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the Updated Green Belt Topic Paper.	Yes	Yes	1. Development should be in accordance with the draft Shropshire Local Plan. Sites contrary to it should be refused. 2. Agree that sites at Tasley, Shrewsbury and the Former Ironbridge Power Station are the most appropriate to accommodate proposed contributions to the Black Country. Albrighton is not an appropriate location to accommodate such contributions. 3. Proposals for Albrighton involve over 500 dwellings (completions, existing commitments and proposed allocations). Agree with the two proposed allocations at Albrighton (ALB017&ALB021), which should be built-out steadily/phased over 10 years to protect the character of the community, with less development in subsequent years to 2038. Also agree with the identification of 3 areas of safeguarded land, which should not be developed until after 2038. New employment development should be directed to RAF Cosford and smaller ad-hoc sites (there is insufficient infrastructure and this would have a detrimental affect on the community resulting from large-scale employment, supermarkets, schools and healthcare centres etc). No other sites should be developed at Albrighton (particularly in the Green Belt or to accommodate contributions to the Black Country). 4. Sites P36A and P36B were assessed and it was concluded they should not be developed. They should remain agricultural land in the Green Belt, their loss would have a negative landscape impact, negative effect on wildlife, cause huge traffic problems and reduce the ability to park/get on the train. Adequate sites at Albrighton are identified in the draft Shropshire Local Plan. 5. Support the proposed 500 dwelling increase to the housing requirement.	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A270	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Site IRN001 (Pages 268/270; Appendix 1 - page 31; and Appendix 10 - pages 21-24).	Yes	No	<p>1. The additional Sustainability Appraisal (SA) assessment of sites to accommodate contributions to the Black Country does not explicitly consider commuting times and distance and there is no evidence this has been factored into the overall scoring of the contribution to the Black Country. A sound approach would be to include an additional criterion specifically related to commuting time to Black Country, this would help inform which sites would be accessible and suitable to meet the needs of the Black Country.</p> <p>2. Consider the proposal to accommodate 600 dwellings of the proposed contribution to the Black Country on the Former Ironbridge Power Station (IRN001) is unsound.</p> <p>- Appendix 2 of the additional SA recognises that the Former Ironbridge Power Station (IRN001) is some distance from main road corridors to the Black Country and the nearest railway, yet this is not reflected in the SA scoring.</p> <p>-The site performs 'poorly' within stage 2a of the SA, meaning it is considered likely to have a significant adverse effect for which mitigation measures should be proposed.</p> <p>-The additional SA concludes mitigation measures will be equally effective in the context of sustainably accommodating the contribution to the Black Country, but no evidence of this is provided.</p> <p>-There is reliance placed on the fact the site benefits from Outline Planning Permission, however this was submitted and approved under the assumption that the development would meet housing and employment needs of Shropshire, rather than the unmet needs of the Black Country. Furthermore, in considering the planning application, the locality and sustainability of the site in relation to the Black Country was not considered.</p> <p>-The reasoning for inclusion of the site in the submission version of the draft Local Plan was also to meet housing and employment needs of Shropshire.</p> <p>-Other sites perform 'fair' or 'good' raising the question of why it is the preferred option to accommodate part of the contribution to the Black Country.</p>	<p>1. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.</p> <p>2. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper. This assessment included specific consideration of the relationship of the site and where appropriate the associated settlement to the Black Country; and the potential of the site to accommodate all or part of the proposed contribution to the Black Country.</p> <p>2. The mitigation measures proposed for the Former Ironbridge Power Station are considered to be effective in the context of sustainably accommodating the identified component of the proposed contribution to the unmet housing need forecast to arise within the Black Country.</p>	No
A270	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Site SHR060, SHR158 & SHR161 (Page 268; Appendix 9 - pages 62/134/142; and paragraph 12.17 page 235).	Yes	No	<p>1. The additional Sustainability Appraisal (SA) assessment of sites to accommodate contributions to the Black Country does not explicitly consider commuting times and distance and there is no evidence this has been factored into the overall scoring of the contribution to the Black Country. A sound approach would be to include an additional criterion specifically related to commuting time to Black Country, this would help inform which sites would be accessible and suitable to meet the needs of the Black Country. An example of the problem with the Council's approach is that both site SHR060, SHR158 & SHR161 and BRD032 achieve 'fair' scores in the Stage 2a assessment, but BRD032 is clearly situated in a more sustainable location in relation to the Black Country.</p> <p>2. Consider the proposal to accommodate 300 dwellings of the proposed contribution to the Black Country on sites SHR060, SHR158 & SHR161 is unsound. the sites has not been properly assessed in the additional SA and is clearly not capable of meeting the housing needs of the Black Country.</p> <p>- When assessing connectivity to the Black Country, the Council assess the settlement and not the site. Whilst Shrewsbury Town Centre lies fairly central in the Shropshire geographic area, this site is to the west of the town, reducing connectivity to the Black Country considerably. Travel times from the centre of the site to Wolverhampton (closest part of the Black Country) are around 1hr 20 mins by public transport and 50 minutes by are (outside peak commuting times). The argument that sites that fall within the Shrewsbury area (which extends to near Wem) are in geographic proximity the Black Country is weak, misleading, inaccurate and unsound.</p> <p>-Geographic location is not factored into the assessment.</p>	<p>1. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.</p> <p>2. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper. This assessment included specific consideration of the relationship of the site and where appropriate the associated settlement to the Black Country; and the potential of the site to accommodate all or part of the proposed contribution to the Black Country.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A270	B003	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Site SHF18b & SHF18d (Appendix 2 - page 8).	Yes	No	1. Sites SHF18b&SHF18d and BRD032 both score 'fair' within stage 2a assessment in the context of accommodating contributions to the Black Country of the additional Sustainability Appraisal (SA). However, they score significantly different in terms of positively or negatively meeting the sustainability criteria (-10 and -5). This is a discrepancy in the overall conclusions of the definition of 'good', 'fair' and 'poor'.	1. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements. 1. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.	No
A270	B004	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Site BRD032/P56 (Appendices 1 and 2).	Yes	No	1. Concerned about the scoring of sites BRD032 and P56 within the updated stage 2a assessment of the additional Sustainability Appraisal (SA). Scoring in relation to the Scheduled Monuments (--) has not been updated since the original SA was prepared, despite clarification provided by Historic England (HE) on the updated Stanmore Masterplan for BRD032. Harm to the Scheduled Monument can be mitigated through provision of amenity/play space creating a buffer; and the area of the site for development post 2038 will not impact the Scheduled Monument.	1. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements. For the avoidance of doubt, this methodology has been correctly applied in that the Stage 2a assessment correctly identifies that the site contains part of a Scheduled Monument. The potential harm resulting from any development of the site on the Scheduled Monument is considered in Stage 3 of the assessment.	No
A270	B005	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Site BRD030 (Page 267; Appendix 4 - page 62; and Appendix 1 - page 31).	Yes	No	1. Sites BRD030 and BRD032 both score 'fair' within stage 2a assessment in the context of accommodating contributions to the Black Country of the additional Sustainability Appraisal (SA). However, they score significantly different in terms of positively or negatively meeting the sustainability criteria (-10 and -5). This is a discrepancy in the overall conclusions of the definition of 'good', 'fair' and 'poor'. This raises a question of the soundness of an approach where a site that has predominantly negative ratings has been considered as the preferred option for accommodating contributions to the Black Country. 2. Given Bridgnorth is identified as one of the most sustainable locations in relation to the Black Country, it would be entirely appropriate for it to be a focus for meeting both Shropshire and Black Country housing needs. Such an approach could include land at Stanmore (BRD032), which could accommodate a significant proportion of the additional need. Such an approach would be far more robust than developing the sites in more remote and unsustainable locations such as on the west of Shrewsbury (SHR060 & SHR158 & SHR161).	1 and 2. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements. 1 and 2. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper. 2. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A270	B006	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Site BRD030 (Appendix 1 - page 31; Appendix 2 - page 24; and Appendix 4 - Pages 63 & 65).	Yes	No	1. Consider the conclusions within the additional Sustainability Appraisal (SA) for BRD030 and the site guidelines in the draft Shropshire Local Plan are not consistent. It is important that the additional SA considers the ability of the site to deliver comprehensive mixed use development; garden village principles (including the requirement to provide high quality housing, employment, new local centre and green infrastructure) to comply with the submission version of the draft Shropshire Local Plan policy. Therefore the SA should specifically include a criteria which assesses the sites ability to comply with the principles of a 'garden village' identified within the Garden Communities Prospectus and the TCPA Garden City Standards guides or any updated equivalent guidelines.	<p>1. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.</p> <p>1. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A270	B007	Updated Housing and Employment Topic Paper.	Chapter 4	Yes	No	<p>1. The approach to identifying broad locations where contributions to the Black Country could be accommodated appears appropriate. However, the Council use this to identify Place Plan Areas as the scope for this assessment, which the draft Shropshire Local Plan specifies have no planning status. The soundness of this approach is questionable and means some areas far removed from the Black Country are included, whilst settlements much closer to the Black Country are excluded due to the market town on which the relevant Place Plan Area is based falling outside the Black Country area of influence. An example is Nesscliffe being included (47 miles to Dudley in the Black Country) and Cleobury Mortimer excluded (26 miles to Dudley in the Black Country); another example is Nesscliffe being included (42 miles to Wolverhampton in the Black Country) and Hinstock being excluded (26 miles to Wolverhampton in the Black Country). The Council's approach to determining where contributions to the Black Country should be accommodated is therefore fundamentally flawed and does not assess all potential, desirable and sustainable locations.</p> <p>2. The proposal to allocate significant proportions of housing on existing proposed allocations to accommodate contributions to the Black Country, rather than allocating new sites is unsound. It undermines the wider aims of the plan and the area-specific strategies within the plan, displaces provision originally intended to meet locally arising housing need, and continues to fail to fully assess the environmental impact of accommodating the unmet need from the Black Country (additional sites are not allocation to accommodate the 1,500 units required to be meet housing need from within Shropshire. There is therefore a demand for 1,500 units, whether arising in Shropshire, the Black Country or elsewhere, for which there is not a corresponding allocation and therefore cannot be appraised). An example is Bridgnorth where the strategy specified that 1,800 dwellings were to be made available for local demand, but this is no longer the case as 600 units are for the Black Country. This cannot be off-set by additional windfall as this approach is already proposed to accommodate the proposed 500 dwelling uplift to the housing requirement and windfall cannot be accurately predicted. So additional allocations are required.</p> <p>3. The basis of the draft Shropshire Local Plan now being promoted is substantially different to that at previous consultation stages. The current consultation (on four highly technical documents) are likely beyond the interest of a causal observer and have little information on how proposed changes impact development in Shropshire over the next decade. Cumulatively changes are significant.</p> <p>4. Aware of Pre-Action Protocol (PAP) correspondence prepared by a third party. Do not have confidence that the documents currently being considered adequately address the concerns raised and substantial risk of challenge remains. The Council must consider returning to an earlier stage in the plan preparation, taking forward an accurate housing need figure, allocating sufficient land to meet this need, and corresponding demand and allocations for employment land, and undertaking an appropriate and robust assessment of all potential impacts from the outset, rather than seeking to retrospectively apply an assessment to issues for which it was not designed to consider</p>	<p>1. The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Shropshire Council considers that this is an appropriate assessment geography within which reasonable options for accommodating contributions to the Black Country will be located.</p> <p>2. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>3 and 4. Regulation 18, Regulation 19 and submission versions of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan.</p> <p>4. Shropshire Council considers that subject to proposed main modifications the draft Shropshire Local Plan is legally compliant and sound.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A270	B008	Updated Green Belt Topic Paper.	Chapter 8	Yes	No	<p>1. Proposed employment allocations at Stanmore Business Park (formerly Industrial Estate) are necessary extensions and supported.</p> <p>2. Support recognition that Stanmore Business Park is a significant employment site associated with Bridgnorth, a centre of excellence for engineering and advanced manufacturing, and a key employment location in the County.</p> <p>3. Exceptional circumstances for proposed employment allocations at Stanmore Business Park should consider respondents Regulation 18 and 19 submissions (including the Exceptional Circumstances Paper prepared by Stansgate Planning in 2020 and report (and subsequent addendum) on the need for expansion at the site prepared by Macmullen Associated in 2020/2021). These confirm the business park is running at capacity with older buildings being refurbished as they become available before being re-let.</p> <p>4. Do not support Paragraph 8.7a(i) regarding the approach to accommodating housing at Bridgnorth - through a mixed-use sustainable urban extension allocation at Tasley (BRD030) outside of the Green Belt.</p> <p>5. Consider the approach to determining where contributions to the Black Country should be accommodated (Paragraphs 8.13 – 8.17) is flawed and does not assess all potential, desirable and sustainable locations.</p> <p>6. In paragraphs 8.13-8.17, BRD030 is identified as an appropriate location to accommodate 600 dwellings to contribute to the unmet needs of the Black Country. However, the Council has stated 'Bridgnorth', not this site, 'has a functional relationship to the Black Country'. No account is taken regarding the need to travel from the west of Bridgnorth to the Black Country (particularly factoring in commuting), which raise questions about the sustainability of areas to the west of Bridgnorth in terms of proximity to the Black Country.</p> <p>7. Regulation 18 and 19 submissions by the respondent demonstrate exceptional circumstances exist to support release of BRD032 (Stanmore Garden Community) from the Green Belt (reinforced by the Council's proposal to release Green Belt for employment land at Stanmore Business Park).</p>	<p>1-3. Noted.</p> <p>4 and 7. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p> <p>5. The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Shropshire Council considers that this is an appropriate assessment geography within which reasonable options for accommodating contributions to the Black Country will be located.</p> <p>6. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p>	No
A271	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Table 12.4 and the updated Stage 3 assessment within the Additional Sustainability Appraisal.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it identifies levels of development for Shropshire and Albrighton (Table 12.4). It also identifies the role of specific parcels of Green Belt and which are not suitable for development (updated stage 3 assessment).</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A272	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, Table 12.4 and Appendix 3 of the Additional Sustainability Appraisal. Paragraphs 4.14-4.21, 5.23-5.27, 6.4-6.8 and 6.13 of the Updated Green Belt Topic Paper.	Yes	Yes	<p>1. Support the draft Shropshire Local Plan as it defines areas for housing development in the short and long term. As two sites are already approved for development in the village, do not see the need for further and specifically oppose development in the Green Belt. Any development in Albrighton must be sustainable and protect the village. Further development would overwhelm services. One of the most important aspects of the draft Shropshire Local Plan is the preservation of Green Belt at Albrighton.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No
A273	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Appendix 3	Yes	Yes	<p>1. Support the draft Shropshire Local Plan. Green Belt around Albrighton must be retained, it is important farmland required for food production (importing is not the answer). Road infrastructure is inadequate to support any development above that proposed within the draft Shropshire Local Plan. The sprawling conurbation that is Shifnal must be avoided.</p>	<p>1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A274	B001	Updated Housing and Employment Topic Paper.	General comments	Not Specified	No	<p>1. Within the draft Shropshire Local Plan, Highley has a proposed housing guidelines of 250 dwellings, but capacity is only identified for 122 dwellings (on proposed allocations and an adjacent affordable housing scheme). Firmly consider there is scope to allocate more homes to Highley and there has been very little scrutiny of the real potential of the settlement to provide more growth.</p> <p>2. Promote site HNN019 for development, failure to include it is a missed opportunity. The site was considered constrained by the landscape and visual sensitivity study (LVSS) undertaken to inform the draft Shropshire Local Plan, but consider this was not calibrated to facilitate development and the land parcels were not sufficiently small to allow a more granular, objective assessment. There was also little consideration of the existing settlement pattern. Site HNN019 is not as sensitive as claimed/the wider parcel. The site is situated between two housing developments (to north and south) and would effectively fill the gap between them/read in the context/backdrop of them. Site photographs and plans provided.</p> <p>3. The LVSS raised concerns about land in prominent 'skylines' which is exactly the context of proposed allocation HNN016, but HNN019 would be lower than adjoining development.</p>	<p>1-3. Shropshire Council considers that the proposed development strategy for Highley is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p>	No
A274	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	General comments	Not Specified	No	<p>1. Disagree with the Council's statement in paragraph 8.64 that greenfield development may have a negative effect on the range of plants and animals and quality and extent of wildlife habitats, particularly in the medium to long term. Given biodiversity net gain is now mandatory and continuing protection for ecological assets, do not see how the Council can assume greenfield development will be more harmful than intensification of brownfield sites.</p> <p>2. Consider the Council needs to re-assess the options to accommodate the proposed uplift to the housing requirement:</p> <ul style="list-style-type: none"> -Do not consider Option 1 (settlement guidelines and windfall allowances) to accommodate the proposed uplift to the housing requirement is the most sustainable option. Also do not understand how it is the 'least-worst' for impacts on most SA objectives (1, 2, 3, 7, 9, and 11) given windfall sites may not trigger biodiversity net gains (BNG) as sites are too small. -Consider Option 3 (increasing site allocations) should be utilised to accommodate the proposed uplift to the housing requirement, given the availability and deliverability of HNN019 at Highley. <p>3. Consider increasing site allocations should have been considered separately from extending existing allocations. These are two very different issues and should be assessed as such. Issues include:</p> <ul style="list-style-type: none"> -Commentary against SA objective 2 only considers extensions to existing allocations. -No acknowledgement that larger strategic sites take longer to deliver, have more upfront infrastructure investment requirements and a longer lead-in time with phased delivery often through multiple developers. -Dispute weighting given to car-based travel as a negative factor, considering the move to electric vehicles and the characteristics of Shropshire which necessitates more private transport being used. -Many understandable unknowns in the assessment, as it is not assessing specific sites/geographical locations - which is a mistake. <p>4. Support conclusion at paragraph 12.30 that Highley Place Plan Area is one location best able to support contributions to the Black Country.</p> <p>5. It may be fair that a further call for sites is not undertaken (as per paragraph 12.45). However, concerned sites in the SLAA (such as HNN019) have not been revisited properly for the purposes of identifying new potential housing allocations. It performed 'fair' as did proposed allocations.</p>	<p>1. Shropshire Council considers the assessment of SA objective 1 is consistent and appropriate.</p> <p>2 and 3. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement. Shropshire Council considers it has assessed all reasonable options for accommodating the proposed uplift to the housing requirement.</p> <p>4. Noted.</p> <p>5. Shropshire Council considers that the proposed development strategy for Highley is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A275	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Green Belt Topic Paper.	Paragraphs 12.1-12.3, 6.4-6.8 and 4.14-4.21	Yes	Yes	1. Consider additional sites for development are not required at Albrighton, as sites have already been proposed for allocation. Significant development in the Green Belt as promoted by Boningale Homes at Albrighton would destroy important agricultural land which is vital for food production, increase traffic and result in loss of important Green Belt	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A276	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraph 12.4	Yes	Yes	1. Support the draft Shropshire Local Plan. If development proposals in the Green Belt go ahead it will dramatically change Albrighton.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A277	B001	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Paragraphs 12.1-12.4	Yes	Yes	1. Support the draft Shropshire Local Plan as it is appropriately scaled and will be sensitively delivered. Strongly oppose over-development of Albrighton and the surrounding area and consider large scale development could endanger lives and the environment.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A277	B002	Updated Housing and Employment Topic Paper.	Paragraphs 7.63-7.64, 8.7-8.8 and 16.64 and Tables 8.1 and 8.3	Yes	Yes	1. Support the draft Shropshire Local Plan as proposed allocations and timescales for their development are appropriate and sympathetic to the size of the development. Consider over-development (particularly on the Green Belt) should be resisted, as it would be detrimental to the rural environment and community due to increased traffic, increased pollution, impact on infrastructure, and local of rural way of life.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A277	B003	Updated Green Belt Topic Paper.	Paragraphs 4.14-4.21, 6.4-6.8 and 6.13	Yes	Yes	1. Support the draft Shropshire Local Plan, which is responsive the residents of Albrighton and protects the village; restricts unnecessary development in the Green Belt; and identifies more appropriate locations to accommodate proposed contributions to the Black Country. Consider over-development would destroy the community.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A278	B001	Draft Policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	<p>1. Do not consider the consultation documents sound and consequently they are unlikely to be legally compliant. They are very long (as are other associated documents), poor-quality, not conducive to public comment and fail the Gunning Principles. No map of sites assessed, no indication of changes from previous versions, and some information is out of date (Appendix 4 on Bridgnorth). This makes it difficult to comment.</p> <p>2. Settlement strategies have not been assessed and consequently there is a reliance on overall conclusions of the assessment of the spatial approach and the individual site appraisals. Needs to be considered if this is appropriate.</p> <p>3. No justification is provided for the proposed housing requirement (19% above need); or for the proposed contribution to the Black Country where the level of unmet need remains unknown (note the Black Countries are now preparing separate plans and the shortfalls are subject to change/much is associated with Sandwell which has lower connectivity to Shropshire/much is associated with the 35% uplift to Wolverhampton's needs which should not be exported).</p> <p>4. No local housing need assessment, transport assessment (there is a need to consider cumulative impacts of traffic from existing/proposed allocations as the road infrastructure is at capacity) or infrastructure plan has been prepared for Bridgnorth. Historically there has been little interest in Bridgnorth for major employers due to transport links, but there is 22.3ha employment land allocated/proposed for allocation in Tasley Parish. Further consideration should be given to the potential for conversions of business properties to residential at Bridgnorth.</p> <p>5. Object to proposed allocation BRD030, which is unsound. The stage 2a Sustainability Appraisal (SA) incorrectly specifies the site is brownfield and within proximity of a primary school, without this the site would achieve a 'poor score'. The site is also in the impact risk zone for two SSSI's and one local wildlife site (application for poultry units on the site refused due to pollution risk to these assets); furthermore air quality in Bridgnorth is already poor; and development of the site would harm listed buildings (two on site) and several non-designated heritage assets (on site) - proposed mitigation is insufficient.</p> <p>6. Accommodating proposed contributions to the Black Country on BRD030 would result in loss of prime arable land (which should be re-considered given the importance of food security as highlighted by war in Ukraine) and protected wildlife habitats; extend urban sprawl; and is contrary to proposals in the Black Country which are seeking to protect Green Belt due to recognition of the value of green space. Furthermore, whilst Bridgnorth has links to the Black Country, BRD030 (and existing allocations at Bridgnorth) are located where such links are weakest (necessitating access via the A458 and causing congestion) and public transport links are poor.</p> <p>7. The sustainability implications of the draft policy on housing for older people and those with disabilities and special needs on BRD030 has not been assessed.</p>	<p>1. Shropshire Council considers that subject to the proposed main modifications resulting from the additional work subject to this consultation, that the draft Shropshire Local Plan is sound and legally compliant. The Council acknowledges that the additional SA work subject to this consultation is technical, but this is unavoidable. This SA work seeks to present the assessment processes and conclusions as clearly as possible whilst ensuring compliance with the assessment methodology and relevant legislation. The Council considers the Housing and Employment Topic Paper (also subject to this consultation) summarises key processes and conclusions (including from the SA), clearly and unambiguously.</p> <p>1. The Council considers this consultation is appropriate and consistent with its Statement of Community Involvement and national requirements.</p> <p>2. The additional Sustainability Appraisal (SA) assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements. The various reasonable options for the level and distribution of development are the subject of SA. Furthermore, the spatial strategy within the draft Shropshire Local Plan (within draft Policy SP2 and other strategic policies) is the subject of SA. Draft settlement Policies S1 to S20 implement draft Policy SP2 (they show how SP2 applies, but they are not considered to represent reasonable alternatives for SA purposes), as such they were not subject to separate SA within the Sustainability Appraisal and Site Assessment Environmental Report undertaken to inform the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.</p> <p>3. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p> <p>3. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.</p> <p>4, 5 and 7. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
							<p>been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p> <p>5. The Council considers that the Stage 2a assessment is proportionate and robust. It should be noted that measurements within the Stage 2a SA are 'as the crow flies' and previous industrial / potentially contaminated land is often found within agricultural fields.</p> <p>6. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p>	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A279	B001	Updated Housing and Employment Topic Paper.	Sections 8-10	Yes	No	<p>1. Evidence fails to positively plan for accommodation of a contribution to the Black Country and high-growth in Shropshire due to the displacement of housing needs on 3 proposed allocations and over-reliance (20%) on unidentified and uncertain windfall sites towards the end of the plan period. This does not align with employment objectives and undermines sustainable growth to principal and key settlements.</p> <p>2. The evidence downplays the significance of the geographical requirements of accommodating contributions to the Black Country, it has downgraded the High Growth aspirations from the Sustainability Appraisal Environmental Report (SD00601), thereby undermining an ability to meet Shropshire's growth needs and to achieve a balanced, sustainable Local Plan.</p> <p>3. Consider additional sites should be allocated. Promote land at Grange Road, Ellesmere (4.4ha) which partly benefits from a SAMDev employment allocation (ELR075) and outline consent for employment use (21/05802/OUT); which could deliver mixed-use housing and employment development. Plan accompanies the response.</p>	<p>1-3. The submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>1-3. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p> <p>1-3. Shropshire Council considers the proposed strategic distribution of development is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the three reasonable options, which concluded that urban focus was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that urban focus was an appropriate approach to the strategic distribution of development.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A279	B002	Updated Housing and Employment Topic Paper.	Section 21 and draft Policy SP2	No	No	<p>1. Consider the revised housing requirement should be 32,100 dwellings to allow a consistent approach to high-growth and a 1,500 dwelling contribution to the Black Country. This uplift of 1,300 dwellings to the submission version of the plan is not quite equivalent to the Black Country unmet needs, but this a function largely of rounding in the percentage growth rates and the policy figure.</p> <p>2. No specific objection to the approach to identifying sites to accommodate proposed contributions to the Black Country. However, the consequences are not rigorously dealt with in the revised plan / evidence base. Specifically each allocation was originally selected to meet needs of Shropshire, absent the Black Country uplift, but by retrospectively reassigning three sites to other needs, the plan is now deficient in considering how the displaced needs are met.</p> <p>3. The Council anticipates windfall housing will address displaced needs, but greater reliance on windfall reduces the ability to effectively plan. Given it is by definition uncertain/unidentified how can there be certainty it will meet specific displaced needs in equivalent, sustainable locations; provide necessary services and facilities; fulfil the wider spatial strategy; or align with employment provision. This is not equivalent to the allocations in the principal and key settlements being lost and as such is not an effective or positive approach to plan-making. Consider over-reliance on windfall provision and approach in development guidelines requires additional allocations.</p> <p>-Whilst Shrewsbury may have capacity for 300 windfall dwellings, there is no evidence this is the case for the 600 dwellings at Bridgnorth and the Former Ironbridge Power Station capacity is only increased by 75 dwellings to align with the planning permission.</p> <p>-The SLAA indicates there are few large potentially deliverable windfall sites, meaning reliance is on small scale windfall sites (often in rural locations).</p> <p>-Would expect windfall as a proportion of total supply/absolute figure will reduce following adoption of the plan</p> <p>-Total windfall reliance is 21% (Table 10.1) which is a significant amount. The majority (3/4) on smaller sites - although agree with the small site windfall allowance figure and application of a slippage rate. For the larger sites (>5 dwellings) caution must be applied as their is uncertainty about their capacity and viability; consider a 15-20% discount should be applied to the total large site windfall supply.</p> <p>4. Consider the distribution of development proposed in Table 21.1 is ineffective.</p> <p>5. Consider the housing land supply identified to achieve the proposed housing requirement is insufficient. It has circa 11.4% headroom, however consider a 5% discount to permissions, prior approvals, resolution to grants, SAMDev and draft Local Plan allocations should be applied to allow for some change to final densities/capacities and delivery rates in the plan period (around 900 dwellings), reducing the headroom to 7.6%. Furthermore, around 20% of the supply is from windfall. Headroom reduces further against the 32,100 housing requirement respondent proposes. Positively allocating additional housing development to the most sustainable locations will ensure growth benefits are best achieved to meet overall plan objectives and alignment to parallel employment land objectives.</p>	<p>1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.</p> <p>2. The submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>3. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p> <p>4. Shropshire Council considers the proposed strategic distribution of development is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the three reasonable options, which concluded that urban focus was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that urban focus was an appropriate approach to the strategic distribution of development.</p> <p>5. Shropshire Council considers the identified housing land supply provides confidence in the deliverability of the proposed spatial strategy (level and strategic distribution of development). The Council has taken a cautious approach to this assessment, including with regard to site capacities and deliverability/developability. Furthermore, a very cautious assumption is made that 10% of deliverable/developable dwellings in a number of supply categories (including those which includes large scale windfall sites) will not be delivered in each five year period is applied, with these dwellings re-considered within the subsequent 5 year periods. The Council notes the support of the small site windfall allowance.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A279	B003	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report.	Section 8, including paragraphs 8.7-8.8.	No	No	<p>1. Consider recalculated options 1 to 3 (set out in paragraph 8.8) for the housing requirement are inconsistent with those presented in the Sustainability Appraisal Environmental Report (SD00601). Specifically the growth options of Moderate, Significant and High were 10, 15 & 18% respectively, not the now lower 5, 10 & 15% respectively (paragraph 8.7). Reliance is placed on ID37 for this, but the inspectors were incorrect in stating that these were the applicable percentage uplifts applied and should have been corrected. Either the percentage uplifts are incorrect or an alternative local housing need figure was utilised which bears no relationship to the 2020 assessment (presume this is not the case as this would raise further concerns on the justification of the housing requirement). Proposals are seeking to retrospectively lower the growth ambitions of the submission version of the Local Plan. No justification or reasoning is offered for lowering the growth assumptions and as such consider this unjustified, not positively prepared and unsound. This also raises a question on the justification of the evidence base of the whole Plan, and potentially reopens previously discussed matters as Hearing sessions.</p> <p>2. Consider the revised housing requirement should be 32,100 dwellings to allow a consistent approach to high-growth and a 1,500 dwelling contribution to the Black Country. This uplift of 1,300 dwellings to the submission version of the plan is not quite equivalent to the Black Country unmet needs, but this a function largely of rounding in the percentage growth rates and the policy figure. This highlights the proposed housing requirement will not meet the underlying high growth assumption; policy objectives of the submission Plan; and the revised evidence fails to support the Plan.</p>	<p>1 and 2. Shropshire Council considers the assessment of reasonable housing and employment land requirement options within the additional Sustainability Appraisal (SA), consistent with the expectations of the Planning Inspectors. Paragraph 5.7 of ID37 stated "What the SA should do is test options based on the 2020 baseline with 2 extra years, but only look at the growth options tested in the original SA, so a 5, 10 and 15% uplift and look at this with the Black Country unmet needs of 1,500 homes and without it. The results of the SA should then be used to assess what is an appropriate housing requirement in the Plan. The Plan should then make clear what the housing requirement for Shropshire is and how much of the Black Country unmet needs are being accommodated in the Plan. This should be included in Policy SP2 as well as the explanatory text which will need modifying accordingly." (paragraph 5.8 of ID37 then indicated the expectation of a similar approach for employment). Paragraph 6.5 of ID37 then stated "What is important is that further SA work is robust, tests different levels of growth (including with and without the Black Country unmet needs). For consistency and clarity these should be the same growth options as the original SA. The housing requirement is a matter for the Council, informed by the new work set out in paragraph 5.7 above." The growth options assessed within the SA constituted around 5, 10 and 15% uplifts to the 2016 Local Housing Need (this was explained by the Council in GC41 which was considered by the Inspectors when preparing ID37). Within the additional SA, the Council has applied the same uplifts to the 2020 Local Housing Need Assessment, which has been found sound by the Inspectors. Shropshire Council considers that the assessment of reasonable housing and employment land requirement options within the additional SA; the subsequent planning judgement exercise summarised within the Housing and Employment Topic Paper and the proposed modifications to the draft Shropshire Local Plan to reflect the conclusions of this process are legally compliant and sound.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A280	B001	Updated Housing and Employment Topic Paper.	Section 8	Not Specified	No	<p>1. Support the proposed continuation of high-growth scenario's and retention of contributions to the Black Country within the proposed housing and employment land requirements, and the proposed continuation of the urban focus approach to the strategic distribution of development. Also no objection to the principle of increasing settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement. However, object to the proposed distribution of increased settlement guidelines and windfall allowances.</p> <p>-This has been informed by windfall completions against the proposed allowance (however, this does not necessarily mean settlement can/cannot accommodate more growth) and other relevant factors.</p> <p>-Consider availability of sites; affordable housing need; balance of housing and employment (of the Principal Centres, Whitchurch still has the second highest ratio of dwellings per hectare of employment land); and other such factors should be taken into account.</p> <p>-Settlements with imbalances between housing and employment (such as Market Drayton) would have been better placed to accommodate an uplift to the settlement guideline and windfall allowance.</p> <p>2. Increasing settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement provides less certainty of delivery than site allocations and increases risk that the housing requirement and settlement guidelines will not be met. Therefore important that proposed allocations deliver as expected and effective monitoring occurs to ensure the overall and settlement specific housing trajectories are met. This is particularly important for Market Drayton (and similar settlements) where windfall development has not been significant and previous settlement housing guidelines not achieved. Robust action will be required (such as an immediate early review) if delivery assumptions turn out to be incorrect.</p>	<p>1 and 2. Noted. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.</p> <p>1 and 2. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p>	
A280	B002	Updated Housing and Employment Topic Paper.	Paragraphs 8.88-8.91	Not Specified	No	See A280 B001.	See A280 B001.	No
A280	B003	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report.	Criteria 3, 4, 15, 16 and 17	Not Specified	No	1. Support the methodology and conclusions of the additional Sustainability Appraisal (SA) subject to wider comments in A280 B001.	1. Noted, see response to A280 B001.	No
A280	B004	Draft Policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	Not Specified	No	<p>1. National guidance stipulates that M4(3) housing consists of wheelchair accessible and wheelchair adaptable housing. It also stipulates that where M4(3) housing is required, it should only be wheelchair accessible where the local authority is responsible for allocating or nominating a person to live in that dwelling. This is reflected in the Council's Whole Plan Viability Assessment, but not this draft Policy.</p> <p>2. Consider the requirement for 5% of dwellings to achieve M4(3) standards is likely to impact the viability of residential development.</p> <p>3. No assessment of the viability of requiring 10-20% of larger development sites to constitute specialist housing have been undertaken, despite the proposed policy having additional cost implications for development. Furthermore, the Whole Plan Viability Assessment identifies three geographies for viability (with the north having challenging viability at full policy requirements, even without affordable housing), but this has not been reflected in the policy.</p> <p>4. The proposed policy is not in accordance with national policy, in particular paragraph 34 of the Framework and paragraphs 10-001 and 10-002 of the PPG.</p>	<p>1-3. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Furthermore, within paragraphs 38-41 ID28 the Inspectors concluded that there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. Reflecting these factors, it is considered appropriate to specify the proportions of specialist housing expected on larger development sites.</p> <p>To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken.</p> <p>With regard to the optional building regulations accessible and adaptable housing standards, the proposed standards for general housing are specifically considered within the Whole Plan Viability Assessment.</p> <p>With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes that such housing will be "subject to a viability assessment at the point of a planning application", consistent with national guidance.</p> <p>The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2</p>	Yes

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
							<p>use class, it is subject to reduced developer contribution expectations. However, the Council recognises that viability can vary between the different forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution which is responsive to needs and development viability.</p> <p>It is also important to note that many forms of specialist housing represent high-density development and as such can achieve effective use of land enhancing viability, may also constitute a proportion of the affordable housing contribution, and also represents an additional outlet on the scheme, which can increase the sites marker, have positive effects on deliverability, and speed-up timescales - which aligns with Government aspirations.</p> <p>However, it is acknowledged that there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such, the Council is proposing a modification to this draft Policy to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies.</p> <p>Furthermore, consistent with the conclusions of the Whole Plan Viability Assessment a modification is proposed to allow the provision of reduced rates of specialist housing provision where it is demonstrated that this is creating viability concerns for otherwise sustainable schemes.</p> <p>Furthermore, it is recognised that there may be circumstances where a specific site is unsuitable for specialist housing or there is no identified need for such housing in the area; as such the Council proposes a modification to this draft Policy to allow for the provision of reduced rates of specialist housing provision where the Council agrees one or both of these circumstances apply.</p> <p>1-3. The explanation to the draft Policy explains "Where dwellings are required to meet M4(3) (wheelchair user dwellings) standard within Building Regulations to comply with this policy, they will normally consist of wheelchair adaptable homes. Wheelchair accessible homes will only be required where Shropshire Council is responsible for nominating a person to live in the dwelling."</p>	
A281	B001	Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 8.7-8.8 and Table 8.3 of the Updated Housing and Employment Topic Paper. Paragraphs 4.14-4.21 of the Updated Green Belt Topic Paper.	Yes	Yes	<ol style="list-style-type: none"> 1. Support the draft Shropshire Local Plan. It identifies sustainable sites for development. Value the Green Belt at Albrighton and consider no further sites should be released from it than proposed. 2. Agree that proposed contributions to the Black Country should be accommodated on brownfield sites such as the Former Ironbridge Power Station, not Green Belt. 	<ol style="list-style-type: none"> 1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation. 	No
A282	B001	Updated Green Belt Topic Paper.	Paragraphs 6.4-6.8	Yes	Yes	<ol style="list-style-type: none"> 1. Support the draft Shropshire Local Plan as protection of the Green Belt is very important. Concerned about past and future flooding, which will be exacerbated by loss of Green Belt and climate change. 	<ol style="list-style-type: none"> 1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation. 	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A283	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.4 and 8.7-8.8	Yes	Yes	1. Support the draft Shropshire Local Plan as it supplies housing in a measured and controlled way. The proposed alternative development by Boningale Homes will result in loss of agricultural land in the Green Belt, destroy the character of the community and increase flood risk.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A284	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report.	Paragraphs 12.4 and Appendix 3	Yes	Yes	1. Support the draft Shropshire Local Plan and the housing needs it meets. Do not agree with proposals by Boningale Homes to build commuter housing on green fields. This will increase pressure on local infrastructure and services (particularly roads which are already poor).	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A285	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Green Belt Topic Paper.	General Comment	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A286	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Green Belt Topic Paper.	General comment	No	No	<p>1. The time taken for the Council to respond to Inspectors ID16 and ID37, the volume of material published and the limited consultation of just 6 weeks is a challenge for lay people responding to matters that affect their local community. Key challenges are (a) the number, length and different iterations of consultation documents and (b) the failure to provide this material on submission of the Plan with now, only 6 week to respond, fails the Gunning Principles.</p> <p>2. The Council have not overcome Issues identified in the respondents Regulation 19 Consultation Response or Hearing Statements on Matter 1 - Legal Compliance/Procedural Requirements in 2022 and 2023, Matter 2 - Duty to Cooperate in 2022 and 2023, Matter 3 - Development Strategy, Matter 4 - Housing and Employment Need in 2022 and 2023, Matter 6 - Green Belt and Matter 7 - Strategic Settlements and this Additional Consultation Response supplements these earlier submissions on these Matters.</p> <p>3. There are inconsistencies and discrepancies in the employment land guideline for Shifnal: originally the requirement was 16ha with an existing 2ha allocation creating a requirement for a further 14ha. The later identification of a net build rate of 40% increased the gross requirement to 39ha with the net requirement increasing to 16ha. The gross requirement is also stated to be 41ha to include a saved SAMDev employment allocation of 2ha, but it is believed this allocation can no longer be delivered and the location for this additional 2h has not been disclosed in the consultation material.</p> <p>4. The Shifnal employment allocation has a gross land area of 39ha with a net 40% plot density for built development. In meeting the Black Country unmet employment land need, it is unclear whether the 30ha need is for land or built development. Is Shropshire providing 30ha to fulfil a 30ha land requirement or contributing 16ha towards a 30ha built development requirement. If the latter circumstance is correct, Shropshire needs to provide 75ha of land to deliver 30ha of built development at a 40% plot density.</p> <p>5. The Council has advocated that 39ha gross (14ha net) is required to balance housing and employment development in Shifnal. The use of 30ha to meet Black Country unmet need means only 9ha is now being provided for Shifnal. This indicates the Shifnal employment land allocation is unjustified and cannot withstand scrutiny.</p> <p>6. Evidence of the promotion and proposed development of the Shifnal employment land allocation by Ruckley Estate, Harrow Estates and Stoford is not accepted. The original developer Morris Property gave way to Harrow Estates/Stoford. Harrow Estates are proposing a mixed use development with 87ha of residential to the north of Stanton Road which the Council fail to</p>	<p>1. Noted.</p> <p>2. Noted.</p> <p>3. The Council clearly set out the employment land guideline for Shifnal in its consultation documents published during the preparation of the Submission Local Plan.</p> <p>- The Preferred Scale and Distribution of Development (PSDD) Consultation (see page 58-59) required Shifnal to accommodate around 16ha with a minimum of 14ha of new land required. This recognised that 2ha of the 4ha allocated in the SAMDev Plan were still available for employment development (see Table 2, page 21) the residual 2ha being already developed for housing in exchange for a Care Home provided on another site.</p> <p>- The Preferred Sites (PS) Consultation (see pages 162-171) identified that employment opportunities in Shifnal are limited in by the availability of land and premises and the quality of employment offered. The employment land position in the PSDD was recognised but three key elements of the Shifnal strategy were identified: (1) the form of employment development would largely be single storey properties, (2) the plot density of development would be 40% of the site area and (3) this would require a significant additional employment land provision above the 16ha and would then be capable of balancing the scale of new housing being provided in the town. The employment land guideline figure for Shifnal would be around 40ha of land and an employment land allocation would be around 38ha of land after deducting the remaining 2ha employment allocation in the SAMDev Plan. The actual proposed employment land allocation to the east of Shifnal was identified with an indicative maximum, gross land capacity of 40ha and an indicative minimum, net built capacity of 15ha.</p> <p>- Regulation 18 and 19 Draft Local Plans - the Council clarified the specific site capacity of the proposed allocation to be a gross land area of 39ha with a net built capacity of 15.6ha (at 40%). This clarified the Shifnal employment land guideline to be 41ha comprising a proposed allocation of 39ha and a saved allocation of 2ha.</p> <p>- Employment (Requirement) Topic Paper (EV112) confirmed the Shifnal employment land guideline to be 41ha comprising a proposed allocation of 39ha and a saved allocation of 2ha.</p> <p>- Employment Strategy Topic Paper (GC4n) confirmed the Shifnal employment land guideline to be 41ha comprising a proposed allocation</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
						<p>mention. It is considered that the infrastructure investments including widening Stanton Road to the A41, limited demand for employment land in Shifnal and the history of permitting residential development on employment land will mean the employment allocation will be used for residential or will only be delivered as part of larger mixed use development including land north of Stanton Road.</p> <p>7. The Council do not indicate how infrastructure works will be funded or how compliance with these obligations will be enforced.</p> <p>8. The Council fail to provide evidence of demand in Shifnal for such a large employment land allocation whilst the broader locality accommodates Telford T54, i54 and its extension at M54 Junction 2, and the Rail Freight Interchange at M6 Junction 12.</p> <p>9. Green Belt Topic Paper suggests that the role of Shifnal and its proposed developments will support the role of Bridgnorth but no such role exists for Shifnal. Shifnal has a dependent relationship on Telford and a commuting relationship with Wolverhampton but does not have a supporting role for Bridgnorth.</p>	<p>of 39ha and a saved allocation of 2ha.</p> <p>- Updated Housing and Employment Topic Paper (GC28) confirmed the Shifnal employment land guideline to be 41ha comprising a proposed allocation of 39ha and a saved allocation of 2ha.</p> <p>- Additional Updated Housing and Employment Topic Paper (GC45) confirmed the Shifnal employment land guideline to be 41ha comprising a proposed allocation of 39ha and a saved allocation of 2ha.</p> <p>4. In the Submission Draft Plan, paragraph 3.18 of the explanation to Policy SP2 clearly states that 'Shropshire's employment requirement of around 300ha of employment land incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan'. This shows that Shropshire is contributing a gross land area of 30ha from its employment land requirement to the Black Country unmet needs.</p> <p>5. The Submission Draft Plan intended that the 30ha contribution towards the Black Country should form part of the delivery of 300ha of employment development in Shropshire. Inspectors ID28 and ID36 requires the 30ha contribution to be identified on a specific site, located in east Shropshire close to the County boundary with South Staffordshire District and the Black Country. The strategy to deliver the 30ha contribution recognises that the jobs that will be provided may meet the employment needs of Shropshire residents who currently commute to employment in the Black Country and the Shifnal area is one location where this outcome is achievable.</p> <p>6. Shropshire Council considers that the proposed development strategy for Shifnal is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p> <p>7. The Submission Draft Plan sets out the development guidelines with infrastructure investment obligations for the proposed land allocations and the delivery of these investments is demonstrated in the Strategic Infrastructure Delivery Plan.</p> <p>8. The Shropshire Economic Development Needs Assessment and the detailed assessments of this evidence in the Employment Topic Papers (EV112, GC4n, GC , GC) have evaluated the employment needs, the employment land requirement and the employment land supply to deliver the preferred strategy for Shropshire to 2038.</p> <p>9. Shifnal is the largest Key Centre in the County and connected with Bridgnorth along the A442. Bridgnorth, the second largest settlement in Shropshire and Shifnal are both located close to the County boundary with South Staffordshire District and the Black Country. Shifnal supports the strategic role of Bridgnorth within the settlement hierarchy of east Shropshire in meeting the needs of rural communities in the Green Belt and the countryside.</p>	

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A286	B002	Updated Housing and Employment Topic Paper	General comment	No	No	<p>1. The 413ha employment land supply provides sufficient capacity to meet the 30ha Black Country unmet need without this 39ha employment land allocation. This indicates there are no exceptional circumstances for the Green Belt land release around Shifnal.</p> <p>2. Council are asked to confirm whether Ruckley Estates have now been asked to provide a further 20ha of land around Shifnal.</p> <p>3. Council should reconsider their 30ha contribution to the Black Country in relation to current evidence of unmet need in each of the four Black Country Local Authorities and not rely on evidence provided by the Association of Black Country Authorities.</p> <p>4. To be sustainable and positively influence commuting patterns, the 30ha employment land contribution to the Black Country should be in Shrewsbury, Bridgnorth and Ironbridge to balance the needs of the 1,500 dwelling contribution to the Black Country.</p> <p>5. The benefits of locating the proposed employment land allocation in Shifnal: an established community, local labour force, existing facilities, services and infrastructure apply equally to the proposed locations for housing to meet the Black Country need in Shrewsbury, Bridgnorth and Ironbridge. The co-location of housing and employment development may also jointly fund new infrastructure investments. It is considered that Shifnal is a less attractive location since labour in Shifnal will already have found employment before the proposed employment allocation can be delivered.</p> <p>6. The high harm of removing land from the Green Belt around Shifnal for employment use and the evidence of the assessment of alternative locations for the proposed employment allocation indicate the Council have retrofitted evidence to justify their predetermined choice of allocation. The Council should also identify the location of the site identified to be 'Madeley' which appears to be outside the Shifnal Place Plan area.</p> <p>7. Proposed housing in Shifnal is phased into years 0-5 and years 6-10 whilst the employment allocation is likely to be delivered in years 10-15. It would be advisable to phase some housing in Shifnal into years 10-15 to balance the employment provision.</p> <p>8. The distribution of development in Shifnal would be more sustainable were the future proposed housing located to the east of the town along with the proposed employment to co-locate significant traffic generating uses. Again the Council are asked to address the comments from Harrow Estates that they are discussing the release of a large mixed use development around Stanton Road in east Shifnal. The proposed location of future housing to the west is an inconsistent approach which challenges the exceptional circumstances for Green Belt land releases around Shifnal.</p> <p>9. The scale and distribution of development in Shifnal on both allocated and safeguarded land is considered to be detrimental to the identified structural problems in Shifnal of constrained highway capacity and fluvial and surface water flooding risks.</p>	<p>1. The Updated Additional Housing and Employment Topic Paper (GC) discusses the employment land supply and explores the flexibility to respond to changing circumstances through the Plan period to 2038. The removal of 39ha would significantly affect the capacity of the employment land supply to meet the strategic objectives of the Plan. The removal of the specific site allocation in Shifnal would also affect the capacity to make a significant contribution towards unmet employment land needs in the Black Country in close proximity to these local authorities.</p> <p>2. Noted, the Council have not made this request to Ruckley Estate.</p> <p>3. The Inspectors have found that the Council have met their legal duty to co-operate with other local planning authorities in accordance with Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended).</p> <p>4. Noted, but the Council have set out their preferred strategy for development to 2038 in Shropshire within the Submission Draft Local Plan.</p> <p>5. - 9. Noted, but the Council have set out their preferred strategy for development to 2038 in Shifnal within the Submission Draft Local Plan. - In relation to point 6. the reference to land at Madeley refers to site SHF024 located wholly within Shropshire. The land adjoins the development boundary around the built form of Telford, adjoining the Stafford Park employment area, south of Junction 4 of the M54. This site is 'in scope' as an alternative location for an employment allocation because it is located within the Shifnal Place Plan area. The site has been assessed in the Updated Additional Sustainability Appraisal Report. This land is located wholly within the Green Belt and contributes to limiting urban sprawl from Telford, as a large built up area, and it is proposed to retain this land within the Shropshire Green Belt.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A287	B001	Updated Housing and Employment Topic Paper	Chapter 6, Paragraphs, 16.125, 16.127, 16.130, 16.133	No	No	<p>1.1. Chapter 6 regarding unmet Black Country housing need. Development of good quality agricultural land, some impacting on the National Landscape and Green Belt, nonsensical. There is more appropriate, available brownfield land in the West Midlands and that identified by Shropshire as part of Telford new town still remains to be developed.</p> <p>2.Paragraph 16.125 Disagrees that reference functional relationship people, other than teachers, unlikely to be driving from Black Country to Much Wenlock.</p> <p>3.Error in Paragraph 16.127 referencing '2ha of employment land in Highley'</p> <p>4.Paragraph 16.130b Insufficient consideration and importance given to extent and severity of flooding which has worsened since Plan review process started. The modelling is already out of date and has not been challenged by Shropshire Council. The proposed housing allocation will not alleviate flooding for most of the town and may exacerbate impact.</p> <p>5.Paragraph 16.130c: Reference to A458 corridor is artificial and does not reflect what is a constrained and difficult route.</p>	<p>1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>2.The additional SA work summarises the process undertaken to identify the geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country. Shropshire Council considers that this is an appropriate assessment geography within which reasonable options for accommodating contributions to the Black Country will be located.</p> <p>3. Error Noted</p> <p>4 &5.Shropshire Council considers that the proposed development strategy for Much Wenlock is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A288	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation	General	Not Specified	No	<p>1. Whilst the draft policy is underpinned by SHMA identified need (is based on the 2014 Sub-National Population Projections for over 75s and the prevalence rates of specialist accommodation within Shropshire) it fails to acknowledge that specialist accommodation may not be reflected by personal choices. This is identified in PPG provides further commentary at ID: 63-012 which identifies that plan making should facilitate provision for older people, who may not want or need specialist accommodation/ care and who would prefer to stay in, or move to, general housing which can be adapted to allow them, to remain within their own homes. Thus, it would be more appropriate to focus on the delivery of adaptable types of dwellings to address older persons and specialist housing needs.</p> <p>2. The policy is not sound as not proven deliverable. Development viability in Shropshire is challenging & benchmark land values set within Viability Study are extremely low. The viability study has not specifically tested the viability of sheltered and extra care schemes Viability evidence is therefore limited and has not fully considered whether the provision of older persons and specialist accommodation would undermine the deliverability of the Local Plan.</p> <p>3. Tiered approach set out in DP1 is not backed by evidence to substantiate the tiers and the increasing percentage requirement and show that these contributions will be deliverable. For lower tier (50-149 dwellings) consider that resultant scale of provision (5 to 15 units) insufficient to attract operators. Middle tier (150-249 homes) would still be at the lower end of operators likely demands, particularly in respect of more intensive care facilities. Consider Policy would not provide sufficient economies of scale for market-led deliver and is unsound by reason of not being justified.</p> <p>4. The suggested policy approach seeks to ensure every allocation contributes to meeting needs, irrespective of whether the site is an appropriate location for older persons and specialist accommodation, with access to existing services and facilities, or are of a scale to deliver on-site services and facilities.</p> <p>5. Proposed amendments to the Policy have insufficient/no justification or supporting evidence and the draft Policy is not 'justified', 'effective' or 'consistent with national policy' and is therefore unsound.</p>	<p>1-5 Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Furthermore, within paragraphs 38-41 ID28 the Inspectors concluded that there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. Reflecting these factors, it is considered appropriate to specify the proportions of specialist housing expected on larger development sites.</p> <p>To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken.</p> <p>With regard to the optional building regulations accessible and adaptable housing standards, the proposed standards for general housing are specifically considered within the Whole Plan Viability Assessment. With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes that such housing will be "subject to a viability assessment at the point of a planning application", consistent with national guidance.</p> <p>The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations. However, the Council recognises that viability can vary between the different forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution which is responsive to needs and development viability.</p> <p>It is also important to note that many forms of specialist housing represent high-density development and as such can achieve effective use of land enhancing viability, may also constitute a proportion of the affordable housing contribution, and also represents an additional outlet on the scheme, which can increase the sites marker, have positive effects on deliverability, and speed-up timescales - which aligns with Government aspirations.</p> <p>However, it is acknowledged that there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such, the Council is proposing a modification to this draft Policy to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies.</p>	Yes
A289	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report	Paragraphs 12.1-12.3, Table 12.4, Appendix 3	Yes	Yes	<p>1. Important to retain the scale & character of Albrighton and protect its natural environment and development to serve the region should use brownfield sites.</p> <p>2. Supports the local plan which provides more than enough housing. Agrees development necessary but Albrighton's infrastructure must be sufficient and if necessary improved to support development.</p> <p>3. Development should be phased to protect rural community feel & character.</p>	1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A290	B001	Updated Housing and Employment Topic Paper	Paragraphs 7.63-764 & 8.1	Yes	Yes	1. Important to not overbuild , OK ,as per paragraphs 7.63 & 7.64	1. Noted. No changes are proposed to the housing requirement set out in paragraphs 7.63 & 7.64	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A291	B001	Updated Green Belt Topic Paper	Paragraphs 7.19 a.ii and d.iii; 7.19 a v-vi ;7.19 b.ii. c.iii. c.iv;7.19 g.i.	Not Specified	No	<p>1.Paragraphs 7.19 a.ii and d.iii suggest evidence of unmet need for local housing. This contradicted by the evident availability, of a range of housing size, types and tenures, for sale and rent over the last five years. Many including shared ownership have remained unsold for 2 years. Given range of housing types readily available, release of site ALV006 / ALV007 from Green Belt provides sufficiently for future need without the need for site ALV009.</p> <p>2.Paragraphs 7.19 a v-vi advocate two separate Green Belt site allocations to provide a choice of delivery in locations well connected to Alveley. However, whilst site ALV006/ ALV007 is located within the village close to facilities should be released from Green Belt for future housing, site ALV009 is not well connected with access via a busy road with no footpaths. Given lack of public transport, vehicular access to the village and its facilities is likely to be favoured by future occupants. This is contrary to NPPF and previous planning decisions and inconsistent with the delivery of sustainable development.</p> <p>3.Paragraphs 7.19 b.ii . c.iii. c.iv Green Belt revised Exceptional Circumstances Statement (EVO51) sets out the role of ALV006/ ALV007 in facilitating additions and improvements to leisure facilities as a community benefit. However, there is a very wide range of sports, recreation and community facilities and groups (as listed) available locally, including a new cricket club house & field permitted in Green Belt which opened May 2023. Also, whilst construction of new buildings is normally inappropriate in the Green Belt, NPPF excepts “the provision of appropriate facilities for outdoor sport, outdoor recreation”.</p> <p>4.Given the evolved proposal to rebuild the Sports Club and Village Hall on their current sites to enhance provision, land within ALV006 / ALV007 is not needed for sports use and the entire space allocation could be used, together with a portion of proposed safeguarded land ALV002, to meet sustainable housing growth needs. It is therefore unnecessary to release ALV009 from Green Belt as an allocation.</p> <p>5.Paragraphs 7.19 g & I identify that performance against Green Belt purposes and the harm to the remaining Green Belt was given due consideration. However, the site is an important wildlife habitat which would be significantly impacted by development, as well as in current agricultural use. ALV006/ ALV007, being used for events, together with ALV002 would be better released for housing having less Green Belt value and within the current village boundary.</p> <p>6.Other options include opportunity to use brownfield land with no Green Belt benefits at the Royal Oak public House for housing being located close to existing relatively recent built shared ownership and privately owned homes.</p> <p>7.Disagree with stated premise that landscape sensitivity of the Severn Valley discounts it as a location, given permitted construction of many residential park homes.</p> <p>8.The proposed approach is unsound, and inconsistent with national policy for delivery of sustainable development, not being not justified or an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence.</p>	<p>1-8. Shropshire Council considers that the proposed development strategy for Alveley is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A292	B001	Updated Housing and Employment Topic Paper	Paragraph 7.61	Yes	No	1. The Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and resultant uplift is supported. However, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.	No
A292	B002	Updated Housing and Employment Topic Paper	Paragraphs 8.65 - 8.66.	Yes	No	1. The proposed approach (settlement guidelines and windfall allowances), focused in three settlements, to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). Consider additional site allocations should be identified to ensure that the Plan is justified, deliverable and effective.	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.	No
A292	B003	Updated Housing and Employment Topic Paper	Paragraph 9.10	Yes	No	1. Sites identified to meet contribution to Black Country needs are proposed allocations which were already included within the submission version Plan. Therefore, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Thus, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire. 2. There are sites appropriate to meet local needs associated within higher-tier settlements, in line with the proposed spatial strategy. These would make an appropriate contribution to meeting an uplift in the overall dwelling requirement and offset the loss of sites specifically identified to meet the needs of the Black Country. MUW012, with the flexibility for further expansion, has the potential to address existing pressures on the town arising from surface water flooding and potentially to provide traffic calming on the A458 if the quantum of development is sized appropriately to allow for these infrastructure costs to be accommodated.	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate. It should be noted that the submission version of the draft Shropshire Local Plan included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan. 2. Shropshire Council considers the proposed development strategy for Much Wenlock is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at Much Wenlock have been informed by a proportionate and robust site assessment process.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A292	B004	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report.	Paragraph 6.8	Yes	No	1. Do not consider that no contribution to the Black Country represents a reasonable option given that paragraph 11 of the National Planning Policy Framework (NPPF) references providing for unmet needs in neighbouring areas and ongoing work in the West Midlands illustrates that the shortfall is increasing. Given this, consider an uplift in Shropshire's contribution towards the housing needs of the Black Country (above that proposed in Option 2), rather than Option 1's no contribution should be considered.	1. Shropshire Council undertook proactive discussions with Local Authorities in neighbouring areas, under the duty to cooperate. These discussions identified that unmet housing and employment land needs were forecast to arise in the Black Country and that it may be appropriate for a contribution to be accommodated in Shropshire. The additional Sustainability Appraisal (SA) specifically considers the sustainability of the reasonable options for contributions towards these unmet needs and the Housing and Employment Topic Paper summarise the subsequent planning judgement exercise. In summary it is considered that proposed contributions of some 1,500 dwellings and 30ha of employment land to meet unmet needs forecast to arise within the Black Country are sustainable and represent an appropriate contribution towards these unmet housing needs.	No
A292	B005	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report.	Paragraphs 10.51 - 10.52	Yes	No	1. The proposed approach (settlement guidelines and windfall allowances) to accommodating the proposed 500 dwelling uplift to the housing requirement is not appropriate. It lacks certainty, is neither aspirational nor deliverable and consequently conflicts with the National Planning Policy Framework (NPPF). There is a finite and diminishing supply of brownfield land and windfall sites within settlements; and recent policy changes (particularly Biodiversity Net Gain) also have a significant impact upon capacity of both allocated and windfall sites. This approach also makes it difficult to determine whether sufficient housing is provided for specific groups in the community (often secured as a percentage of allocated sites, with windfall sites/brownfield sites less likely to trigger requirements). Consider additional site allocations should be increased to ensure more certainty.	1. Shropshire Council considers the proposed mechanism to accommodate the uplift to the housing requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the housing requirement.	No
A292	B006	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report.	Paragraphs 12.82-12.87	Yes	No	1. The assessment of sites to accommodate proposed contributions to the Black Country considered all sites in the relevant assessment geography. As recognised in paragraph 12.84 of the additional Sustainability Appraisal (SA) it is not surprising sites identified for this purpose are proposed allocations. However, as they were previously identified to meet local needs, this reduces contributions to Shropshire needs. Therefore, further consideration should be given to increasing the allocation of housing land within the Plan to meet the needs of Shropshire. 2. There are sites appropriate to meet local needs outside the identified assessment geography associated with higher-tier settlements which would offset the loss of any sites specifically identified to meet the needs of the Black Country, whilst also meeting settlement specific housing requirements. There is additional land adjacent to site allocation MUW012 which could accommodate this need.	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate. 2. Shropshire Council considers the proposed development strategy for Much Wenlock is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers proposed allocations at Much Wenlock have been informed by a proportionate and robust site assessment process.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A292	B007	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report.	Table 8.6	Yes	No	1. The Updated Additional Sustainability Appraisal conclusion that Housing and Employment Topic Paper High Growth Option, plus contribution to the Black Country Authorities Unmet Housing Needs, is the most sustainable of the reasonable options identified and is supported. The Updated Housing and Employment Topic Paper provides significant additional evidence supporting the proposed housing requirement and whilst the resultant uplift is supported, it is unclear how the magnitude of this uplift has been derived. The housing requirements in both the submission version of the draft Shropshire Local Plan and the now proposed requirement are based on 2020 assessments of Local Housing Need, a 15% 'high-growth' uplift and a 1,500 dwelling contribution to the Black Country. Agree with the Inspectors concern that the submission version of the Plan and supporting Sustainability Appraisal were seemingly based only on meeting the needs of Shropshire and does not include the additional housing contribution towards the needs of the Black Country. As a consequence, it is contended the newly proposed housing requirement should be in the magnitude of 1,500 dwellings above the submission version (32,800 dwellings or 1,491 dwellings per annum).	1. Shropshire Council considers the proposed housing requirement is both soundly based and justified. Its identification was informed by Sustainability Appraisal (SA) of reasonable options, which concluded a housing requirement of 31,300 dwellings was the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that a housing requirement of 31,300 dwellings was appropriate.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A293	B001	Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation	Parts 3 & 5	Yes	Yes	<p>1.Housing need survey work undertaken identifies a lack of suitable accessible dwellings to purchase for older people, who are not eligible for housing association homes, to downsize to. This would free up housing. New development has been larger two storey 3/4 bedroom houses.</p> <p>2.Support policy direction but consider that it should make stronger provisions, to address needs in the extensive rural areas of Shropshire where developments will fall below meaningful thresholds for delivery of accessible development. Consider that only urban developments will reach the stated targets and would like to see viability evidence that has been undertaken to support the approach.</p> <p>3.Policy should require all developments to be adaptable and accessible (unless site specific conditions prevent this), and that all developments of 5 or more should have a minimum of 1 dwelling that is wheelchair accessible with windfall sites being encouraged to include accessible homes.</p> <p>4.Wheelchair accessibility standards within the policy are the bare minimum and do not address all relevant internal space requirements such as sufficient room for a wheelchair plus assistance where toilets need an extra 2 sq. m.</p> <p>5.Policy should address homes for partially sighted residents.</p> <p>6.Support the policy intention of integration of older and special needs residents within communities.</p>	<p>1-6. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Furthermore, within paragraphs 38-41 ID28 the Inspectors concluded that there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. Reflecting these factors, it is considered appropriate to specify the proportions of specialist housing expected on larger development sites.</p> <p>To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken.</p> <p>With regard to the optional building regulations accessible and adaptable housing standards, the proposed standards for general housing are specifically considered within the Whole Plan Viability Assessment. With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes that such housing will be "subject to a viability assessment at the point of a planning application", consistent with national guidance.</p> <p>The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations. However, the Council recognises that viability can vary between the different forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution which is responsive to needs and development viability.</p> <p>It is also important to note that many forms of specialist housing represent high-density development and as such can achieve effective use of land enhancing viability, may also constitute a proportion of the affordable housing contribution, and also represents an additional outlet on the scheme, which can increase the sites marker, have positive effects on deliverability, and speed-up timescales - which aligns with Government aspirations.</p> <p>However, it is acknowledged that there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such, the Council is proposing a modification to this draft Policy to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies.</p> <p>1-6. The wider policy requirements in this draft policy identify other mechanisms which aim to deliver specialist housing, including within more rural communities.</p> <p>4. M4(3) standards seek to ensure that housing meets the needs of those in wheelchairs.</p> <p>5. The draft Policy makes general provision for those that have disabilities and special needs. It is complemented by the wider draft policies in the draft Shropshire Local Plan which seek to address the quality and type/tenure of new housing.</p>	Yes

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A293	B002	Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report	Section 5	Yes	Yes	1.Stated Sustainability Objectives used throughout the document are out of date regarding environmental objectives, with no real urgency or mitigations for climate and biodiversity emergencies, Updated NPPF, 8c; 11a;157-160; 185-186 referenced.	1.The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements.	No
A294	B001	Updated Green Belt Topic Paper	Paragraphs 6.4-6.8	Yes	Yes	1.Strongly supports the local plan and retention of Green Belt. Larger scale development would be detrimental to sense of community.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A295	B001	Updated Green Belt Topic Paper	Paragraphs 6.4-6.8, 6.13	Yes	Yes	1.Strong support for Local Plan, its Green Belt provision. Opposes loss of historic character of the area and its community. Seeks retention of Green Belt and supports planned phased development.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
A296	B001	Draft Policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General comments	No	No	1. The Parish Council is aware of the ageing demographic across the Parish. The large development at Tasley represents an opportunity to increase the provision of supported living accommodation but this will also require adequate support services including district nurses, carers and/or medical staff. The increased support for elderly people with complex needs is welcomed but appropriate infrastructure to underpin this development must be provided. Will those investing in larger developments be required to invest in the necessary infrastructure to achieve a positive outcome for all.	1. The clear purpose of this policy is to support the achievement of the housing needs of older people and those with disabilities and special needs in a way that aligns with the Council's social care strategy (People's Strategy) to meet older people's deliver lifestyle, care and service needs. Shropshire Council considers the draft policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals and the requirements of the People's Strategy. This Draft Policy forms part of the wider strategy to meet the housing and service needs of the communities and residents of Shropshire.	No
A296	B002	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report.	General comments	No	No	1. The Updated Additional Sustainability Appraisal Report considers housing sites and employment sites separately to each other and so the SA does not consider the co-location of sites nor the transport routes between preferred housing sites and employment sites within the place plan area and the implications for the assessment of the carbon footprint impact and environmental mitigation measures. 2. The SA assessments do not appear to consider STC002 nor P58a as being in the Greenbelt which is not correct. This overlooks the direction in the Draft Shropshire Plan (page 185) that compensatory provision will be made due to loss of 11.5ha of Green Belt land at Stanmore. 3. The compensatory provision is expected to comprise Investment in the quality of the Country Park but it is not clear how the loss of 11.5 ha of Green Belt can be compensated within an existing, well established Country Park extending to 40ha. Following the Regulation 18 Consultation, the site of STC002 was levelled and no buffer zone was established between housing and employment sites and consequently, complaints of pollution have increased.	1. The additional Sustainability Appraisal assessment work undertaken by the Council employs a methodology consistent to that utilised throughout the plan making process. This methodology was informed by a Scoping Report, refined through consultation. The Council considers this methodology is appropriate and consistent with relevant legislation and policy requirements. 2.- 3. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within the additional Sustainability Appraisal (SA) and in the Housing and Employment Topic Papers.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A296	B003	Updated Housing and Employment Topic Paper.	General comments	No	No	<p>1. The Draft Plan is not justified for Bridgnorth Place Plan Area and evidence is required to show the strategy is appropriate including:</p> <ul style="list-style-type: none"> - a Local Housing Need Assessment to justify the scale of housing in the Bridgnorth Area including Worfield & Rudge Parish; - Evidence for the proposed scale of employment growth - Evidence for the 600dws in Bridgnorth to contribute towards the Black Country unmet housing need especially given that part of the site comprises a saved SAMDev allocation; - Evidence demonstrating how the shortfall in the delivery of jobs, housing and business will be addressed in the period to 2038; - a Strategic Highways Assessment demonstrating how Bridgnorth forms part of the Strategic Transport Corridor in the County. It is considered that Bridgnorth is not part of a Strategic Corridor in relation to the Updated Housing and Employment Topic Paper (2024) in paragraph 16.87(d) and the Marches LEP Investing in Strategic Corridors Report (2016) which removes Bridgnorth from the objective to prioritise investment in strategic locations and growth zone including strategic corridors with road and rail connections identified in the Shropshire Economic Growth Strategy (2017). - an Infrastructure Plan to deliver the investment to support the proposed level of growth; - Evidence demonstrating the sustainability of the strategy based on the delivery of jobs on the SAMDev allocation in Bridgnorth; - Evidence which justifies the scale of unmet housing needs in the West Midlands. This also requires investment housing, employment, the road network and provision of reliable bus transport to ensure the Shropshire strategy is effective and can contribute to towards unmet need in the region; - Local Plan should tackle sustainability in public transport - this requires investment in infrastructure to support families without access to two cars in rural communities to avoid the isolation caused by limited transport options. <p>2. The absence of the Local Transport Plan at several consultation stages of the Local Plan questions the soundness of the Plan.</p> <p>3. The Bridgnorth employment guideline of 49ha equates to 15.3% of the Country employment land requirement. This is disproportionate to the Bridgnorth guideline which is only 5.3% of the housing requirement. The Shropshire Authority Monitoring report shows employment completions of 6.5ha for the 11 years from 2006-17 but 49ha is expected of the 22 years from 2016-38. A previous AMR expected Bridgnorth and Shifnal to perform stronger roles in the delivery of employment but is this justified. Bridgnorth has limited transport connectivity, the Viability Study found office and industrial development to be not viable in Shropshire and separate viability assessments are not provided for the Tasley Garden Village and Stanmore employment allocations.</p>	<p>1. - 3. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy).</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A296	B004	Updated Green Belt Topic Paper	Paragraphs 8.4, 8.11, 8.12, 8.26(a)(i) with Footnote 4.	No	No	<p>1. The exceptional circumstances to justify the removal of Site STC002 and P58a from the Green Belt are not accepted. The Updated Green Belt Topic Paper (2024) challenges the release of these sites in:</p> <ul style="list-style-type: none"> - Paragraph 8.4 identifies that 49ha of employment land has been provided to create choice and competition in the market but this shows there are sufficient, suitable alternative employment sites to meet the needs of the town and the exceptional circumstances to release STC002 and P58a are not justified. - Paragraphs 8.11 and 8.12 identifies that Bridgnorth does not require land to be safeguarded from the Green Belt to meet the future development needs of the town. The identification of a future direction of growth beyond site BRD030 also shows that the exceptional circumstances to release STC002 and P58a are not justified. - Paragraph 8.26(a)(i) with Footnote 4 references the grant of planning permission for an advanced metals recovery pyrolysis plant in Building 10 on Stanmore Industrial Estate. Building 10 was formerly the Marches Centre for Manufacturing Technology (MCMT) which was an advanced engineering facility. MCMT have vacated Building 10 and the subsequent company Circular Resources that proposed the pyrolysis operation have also vacated Building 10. The building now accommodates Seal Fuels providing domestic fuels and pet food. This leasing record for Building 10 shows the exceptional circumstance of the MCMT being located on Stanmore Industrial Estate is no longer justified. <p>2. The release of Green Belt land for the expansion of existing engineering companies may be supported but market forces dictate that occupancy of individual buildings cannot be controlled. The release of Green Belt land for non-engineering companies does not constitute exceptional circumstances especially where alternative site options are available. The broad mix of employment land uses on Stanmore Industrial Estate also questions the exceptional circumstances to remove land from the Green Belt at Bridgnorth</p>	1. - 2. Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed.	No
A297	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A298	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. No justification for development around Shifnal. Infrastructure (particularly roads impacted by large vehicles going through the town despite signage advising otherwise) cannot cope with these increases. Consider there are sufficient brownfield sites in the Black Country to accommodate their own needs.	1. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.	No
A299	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. No justification for development around Shifnal. Infrastructure (particularly roads impacted by large vehicles going through the town despite signage advising otherwise) cannot cope with these increases. Consider there are sufficient brownfield sites in the Black Country to accommodate their own needs.	1. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A300	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A301	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A302	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A303	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A304	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A305	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A306	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No

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A307	B001	Updated Green Belt Topic Paper.	General comments	Not Specified	Not Specified	1. Object to development in the Green Belt at Shifnal	1. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.	No
A308	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No
A309	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General comments	No	No	1. Please see the report submitted on behalf of Shifnal Matters, Shifnal Town Council and Tong Parish Council - reference A0153.	1. Noted, see response to A0153.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
A310	B001	Updated Housing and Employment Topic Paper	Chapters 2 and 14	Yes	No	<p>1. Note the Council proposes to pursue a high growth employment requirement (15% above identified need) and a further contribution to the unmet needs of the Black Country.</p> <p>2. Strongly support the Council's intention to allocate additional sites to accommodate employment land contributions to the Black Country, as to meet this need within existing allocations would pose a significant risk to the ability of existing employers in Shropshire to implement growth plans. The risk of additional competition for sites arising from 'overspill' from the Black Country will be mitigated by allocation of two logical/appropriate additional employment sites (SHF018b&SHF018d) at Shifnal (an appropriate location) to accommodate contributions to the Black Country. However, this does not support established major employers in the area.</p> <p>3. Whilst the proposed approach (utilising settlement guidelines and windfall allowances) to accommodating the proposed 20ha uplift to the employment land requirement appears logical in theory. However, this approach will only support existing business where land is available in appropriate/viable locations. It is not clear that the Council has investigated this option in sufficient depth to be certain there is scope and capacity to deliver appropriate expansion options in major employment generating settlements. Consider that in the absence of new allocations, the Council has an opportunity to amend policy governing windfall to ensure the preferred approach is practicable and able to deliver modernisation and expansion of existing businesses. As such, concerned about the soundness of this overly-simplistic approach.</p> <p>4. Operating over two or more sites creates a requirement for constant 'double handling' of products leading to a greater carbon footprint and significant cost burden, particularly for industrial processes which handle heavy products. Where Bridgnorth Aluminium to expand, it would be at and around its existing site; but expansion to north and west is not possible due to existing development and expansion to the south and east would be within the Green Belt. The Council consider there is sufficient flexibility and allowances in the draft Shropshire Local Plan to meet demand for employment land, which may be true elsewhere, but is not at Bridgnorth Aluminium where proposals would be subject to local/national Green Belt policies (demonstrating very special circumstances).</p> <p>5. The Council includes support for the development of employment sites (Part 6g of SP13) however it is important that the Council clarifies such inward investment opportunities could contribute to a Very Special Circumstance.</p> <p>6. Do not believe the work undertaken as part of this consultation or as part of the wider Local Plan preparation adequately supports the growth aspirations of existing businesses such as Bridgnorth Aluminium.</p> <p>7. Consider additional employment land allocations should be made around the existing Bridgnorth Aluminium site.</p>	<p>1. Noted.</p> <p>2. Noted. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>3 and 5. Shropshire Council considers the proposed mechanism to accommodate the uplift to the employment land requirement is both soundly based and justified. Identification of this approach was informed by Sustainability Appraisal (SA) of the four reasonable options, which concluded that the use of settlement guidelines and windfall allowances represented the most sustainable option. It was also informed by a subsequent planning judgement exercise (as summarised within the Housing and Employment Topic Paper), which concluded that the use of settlement guidelines and windfall allowances was an appropriate mechanism to accommodate the proposed uplift to the employment land requirement. It is important to note that draft Policy SP13 has already been the subject of examination.</p> <p>4, 6 and 7. Shropshire Council considers that the proposed development strategy for Bridgnorth is appropriate, effective, sustainable, and deliverable (this includes the existing commitments (including existing allocations), proposed allocations and proposed windfall allowances identified to contribute towards achieving each proposed development strategy). Shropshire Council considers the proposed allocations have been informed by a proportionate and robust site assessment process, which included consideration of whether a site is located within the Green Belt and if it is the harm that would result from releasing the site from the Green Belt, alternative options and whether exceptional circumstances existed. Shropshire Council has sought to positively respond to the aspirations of local employers, where it is considered appropriate and they were expressed during the plan making process.</p>	No
LA001	B001	Not stated	General	Not Specified	Not Specified	<p>1. Generally, in support of the Local Plan. Mostly supportive of the additional/amended documents, subject to comments set out, and supports progress towards ensuring there is an up-to-date Plan.</p> <p>2. No objection to the updated Housing and Employment Topic Paper, or updated Green Belt Topic Paper. Supportive of the approach to calculation of Housing Need and the approach to Green Belt release, within the confines of possibilities and legislative requirements</p> <p>3. Whilst the Council's approach of increasing windfall allowances may be acceptable, additional allocations throughout Shropshire are appropriate and should be considered to more robustly ensure that the Plan is 'Sound' and plans positively.</p>	<p>1& 2. Noted</p> <p>3. The Housing and Employment Topic Paper provides extensive information on windfall development in Shropshire (permissions granted since submission of the draft Shropshire Local Plan for examination, past windfall trends and known windfall opportunities). Shropshire Council considers that this is compelling evidence that windfall development has and will continue to form an important component of development that occurs in Shropshire, this is unsurprising given the characteristics of the area. This information also provides confidence on the deliverability of the use of settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
LA001	B002	Draft Policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General	Not Specified	Not Specified	<p>1. Supportive of intention to plan for people with extra needs but has issues with some elements of the Draft policy which should use more precise terminology to ensure no misinterpretation of Building Regulations requirements, including M4(2), M4(3)a, M4(3)b. Additionally the Council should ensure that they are meeting PPG advice relating to development and Building Regulations.</p> <p>2. Do not consider that it will be viable/appropriate to require that all sites (including allocations) should include specialist housing provision. Notably, availability, demand (or need) for such accommodation varies significantly according to location which needs to be taken into account. Evident that there has been significant provision of older persons development in some parts of Shropshire, but a more pronounced need remains in other locations. Thus an assessment of the level of need for specialist housing, undertaken at the time of planning application, should be considered alongside the level of provision advised within paragraphs 15-17.</p> <p>3. Some development sites (and/or allocations) may not be appropriately located, particularly in relation to access to services, in order to sustainably provide specialist housing.</p> <p>4. The draft Policy (particularly in conjunction with DP1 and DP4) may result in some development sites being unviable as a result of onerous housing mix requirements.</p>	<p>1-4. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Paragraph 63 of the National Planning Policy Framework (NPPF) specifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Furthermore, within paragraphs 38-41 ID28 the Inspectors concluded that there is a need for more certainty regarding how specialist housing will be delivered in Shropshire. Reflecting these factors, it is considered appropriate to specify the proportions of specialist housing expected on larger development sites.</p> <p>To inform the draft Shropshire Local Plan, a Whole Plan Viability Assessment has been undertaken.</p> <p>With regard to the optional building regulations accessible and adaptable housing standards, the proposed standards for general housing are specifically considered within the Whole Plan Viability Assessment. With regard to the specialist housing provision, the Whole Plan Viability Assessment concludes that such housing will be "subject to a viability assessment at the point of a planning application", consistent with national guidance.</p> <p>The Council considers that specialist housing is a viable form of development, particularly as in circumstances where such housing is C2 use class, it is subject to reduced developer contribution expectations. However, the Council recognises that viability can vary between the different forms of specialist housing. For this reason, the draft policy specifically recognises the diverse forms of housing that comply with the definition of specialist housing and allows for an appropriate mix as part of the expected contribution which is responsive to needs and development viability.</p> <p>It is also important to note that many forms of specialist housing represent high-density development and as such can achieve effective use of land enhancing viability, may also constitute a proportion of the affordable housing contribution, and also represents an additional outlet on the scheme, which can increase the sites marker, have positive effects on deliverability, and speed-up timescales - which aligns with Government aspirations.</p> <p>However, it is acknowledged that there may be circumstances where the requirement to provide specialist housing alongside other requirements could affect development viability. As such, the Council is proposing a modification to this draft Policy to allow for more flexibility regarding site guidelines/settlement guidelines where they are exceeded as a result of provision of appropriate forms of specialist housing – provided the development still constitutes an appropriate form of development having regard to wider policies.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
LA002	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1 - 12.3, Table 12.4, Appendix 3 Shropshire Local Plan - Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Paragraphs 7.63 and 7.64, 8.7 - 8.8, 16.64 - 16.65, Table 8.1 & 8.3 Updated Housing and Employment Topic Paper. Paragraphs 4.14 - 4.21, 5.23 - 5.27, 6.4 - 6.8, 6.13. Updated Green Belt Topic Paper.	Yes	Yes	<p>1. Fully supports local plan as it clearly defines current and future land uses, further comments relate to opposition to proposed development by Bonginale Homes.</p> <p>2. There should be a range of settlement size choices as locations for people to live. Albrighton provides an attractive residential location as a rural village location with green space and a range of local amenities and people and should continue without excessive development to provide the choice to live in a village location.</p> <p>3. Insufficient jobs & infrastructure to support development.</p> <p>4. Sufficient housing provision around Albrighton to meet Shropshire's commitment to housing provision over the next twenty years, including large scale housing in Telford and Wrekin.</p> <p>5. Brownfield and building reuse development opportunities should be taken rather than greenfield.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
LA003	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1 - 12.3, Table 12.4, Appendix 3 Shropshire Local Plan - Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Paragraphs 7.63 and 7.64, 8.7 - 8.8, 16.64 - 16.65, Table 8.1 & 8.3 Updated Housing and Employment Topic Paper. Paragraphs 4.14 - 4.21, 5.23 - 5.27, 6.4 - 6.8, 6.13. Updated Green Belt Topic Paper.	Yes	Yes	<p>1. Fully supports local plan as it is a well-considered, positive document, which based on consultation with local residents and clearly defines current and future land uses.</p> <p>2. The Plan gives robust protection to valued Green Belt which contributes to the landscape and village and provides for agriculture, biodiversity and environmental sustainability.</p> <p>3. Opposed to proposed development by Bonginale Homes which will result in overexpansion and adversely impact on facilities.</p>	1-3. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
LA004	B001	Not stated	Table 10.3 Updated Housing and Employment Topic Paper & General	Not Specified	Not Specified	<p>1. Concern that the figures at Table 10.3 Residential Guidelines and Residential Supply within Community Hubs relating to Baschurch Parish are incorrect and that proposed allocations without planning permission as at 31st March 2023 should read 28 not 55.</p> <p>2. The exception site policy should direct social housing development to locations near the amenities whenever possible.</p>	<p>1. Noted. The figure of 55 dwellings reflects capacity of proposed allocations BNP024 and BNP035 which provide for 35 and 20 dwellings respectively.</p> <p>2. Noted. Shropshire Council considers that the draft policies in the draft Shropshire Local Plan effectively address locational requirements for affordable housing.</p>	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
LA005	B001	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report. Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	Paragraphs 12.1 - 12.3, Table 12.4, Appendix 3. Shropshire Local Plan - Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report. Paragraphs 7.63 and 7.64, 8.7 - 8.8, 16.64 - 16.65, Table 8.1 & 8.3 Updated Housing and Employment Topic Paper. Paragraphs 4.14 - 4.21, 5.23 - 5.27, 6.4 - 6.8, 6.13. Updated Green Belt Topic Paper.	Yes	Yes	1. Concerned about potential impact on infrastructure of the rural village community of Albrighton. Local Plan presents a measured approach to control the future of the village particularly Green Belt protection and access to education.	1. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
LA006	B001	Updated Housing and Employment Topic Paper.	Paragraphs 7.63 and 7.64, 8.7 - 8.8, 16.64 - 16.65, Table 8.1 & 8.3 Updated Housing and Employment Topic Paper.	Yes	Yes	1. Albrighton provides an attractive rural residential location and should continue without excessive development changing it to a West Midland suburb. 2. Supports local plan as it is based on consultation with local residents and ensures that changes will happen in a controlled way over a reasonable timescale with supporting infrastructure to accompany. The Plan also, by reinforcing the essential principle of the Green Belt, protects rural community character, environment, wildlife, green space and agricultural land and provides for recreation. 3. Paragraphs 7.63 & 7.64 Supports increase in housing for Albrighton, noting housing issues and unaffordability for most young people. 4. Table 8.1 There are proposed for 500 houses in Albrighton. Additional proposed development at Albrighton South is not supported locally & is developer 'rural vandalism' and incompatible with narrow village roads and should be refused. 5. Agreed developments should be phased slowly to reflect existing infrastructure inadequacy. 6. Paragraphs 8.7 - 8.8 Important role of Green Belt for recreation and flood protection due to water absorption capacity. Flooding is a particular issue in the area around the proposed Boningale Homes site. 7. Green Belt unsuitable for employment buildings, retail facilities, school and other unneeded amenities offered by developers to gain support for development. 8. Need to build on brownfield sites and focus on urban renewal in Wolverhampton and the West Midlands.	1-8. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
LA006	B002	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report.	Paragraphs 12.1 - 12.3, Table 12.4, Appendix 3. Shropshire Local Plan - Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	Yes	Yes	<p>1. Albrighton provides a small rural community with sufficient infrastructure & facilities to meet every day needs and should not become a West Midlands suburb.</p> <p>2. Supports local plan as development proposals for houses and businesses are based on consultation with residents and ensures that changes will happen in a controlled way over a reasonable timescale with supporting infrastructure to accompany. The Plan also, by reinforcing the essential principle of the Green Belt, protects rural community character, environment, wildlife, green space and agricultural land and provides for recreation.</p> <p>3. 12.1 - 12.3 plan supported because it is based on informed consideration of the area and best locations for new development.</p> <p>4. Telford was created as location to accommodate Black Country overspill and this role should continue. Other better sites in Shropshire to accommodate unmet need and Shrewsbury, Tasley and the Former Ironbridge power station are identified as preferred.</p> <p>5. Table 12.4 Boningale homes' proposed sites P36A and P36B are inappropriate for development due to road infrastructure and potential traffic and access issues, including lack of direct motorway connection, also impact on conservation area & listed building & its setting. Sufficient suitable development land already identified in Albrighton ALB017 and ALB021 which will provide for village and reasonable level of incoming need.</p>	1-5. Noted. No specific changes are proposed to the proposed strategy for Albrighton as a result of the additional material that was the subject of this consultation.	No
LA007	B001	Draft Policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	General	Not Specified	Not Specified	<p>1. The policy refers to supporting people to remain independent within their own homes and within their existing communities and support networks for as long as possible. 'As long as possible' may not always be the best option for the person or persons concerned, technology is often poorly represented in Rural Areas and older persons may struggle with even low level technology.</p> <p>2. The thresholds and percentage requirements for delivery of M4(3) and M4(2) dwellings need to be reconsidered to ensure more dwellings are built to this standard.</p> <p>3. Housing for older persons and those with disabilities should not be distributed across a development, rather it should try to cluster accommodation to create retirement communities.</p> <p>4. Shropshire Council should work with a variety of specialist developers to ensure the best possible accommodation maybe developed on sites where the policy is in force.</p> <p>5. The is a large number of policies and documents with multiple cross referencing which is not user friendly.</p>	<p>1-Noted.</p> <p>2 &3. The Council considers the proposed thresholds are appropriate. The thresholds identified for the 'categories' of housing within which proportionate provision of appropriate forms of specialist housing is required are responsive to both our understanding of the nature of development schemes that occur in Shropshire and the concept of achieving multi-generational and inclusive communities.</p> <p>4-5. Noted</p>	No
LA007	B002	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report.	General	Not Specified	Not Specified	<p>1. The length of the document and Appendices would not encourage public participation and severely impact Town Councils to be able to make any informed response.</p>	1. Noted.	No
LA007	B003	Updated Housing and Employment Topic Paper. Updated Green Belt Topic Paper.	General	Not Specified	Not Specified	<p>1. Supports the overall aim of Shropshire Council in the Local Plan to underpin the proposed spatial strategy the principles of high growth and urban focus.</p> <p>2. Any effect on the allocation of Green Belt land to accommodate the need of the Black Country may impact on Alveley, Albrighton, Bridgnorth and Shifnal and their views would have greater relevance.</p>	<p>1. Noted.</p> <p>2. Noted. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p>	No
LA007	B004	General Comments		Not Specified	Not Specified	<p>1. Concerned Council resources will undermine the extent and quality of documents produced.</p>	1. Noted.	No

Part A Reference	Part B Reference	(Q1). Relevant Document(s)	(Q2). Relevant Document Paragraph(s)	(Q3a). Legally Compliant	(Q3b). Sound	(Q4). Summary of Main Comment(s) Raised Within the Response	Shropshire Council Response	Proposed Modification(s)
LA008	B001	General Comments		Not Specified	Not Specified	<p>1. It is unclear how development in Shropshire will be changed from developer/market led to being led by the needs of the local community. Developers are building the size of the property that generates the most profit, rather than smaller properties that would better suit the needs of the local community, whether this is for starter homes or for older people. There is a lack of smaller properties to downsize to.</p> <p>2. There is a need to emphasize that Shropshire has a higher than average proportion of elderly people and has an aging population.</p> <p>3. There is a need for affordable housing starter homes for young families.</p> <p>4. The aging population is directly affecting Shropshire Council resources and ability to provide services.</p>	<p>1. Noted. Draft Policy DP1 addresses housing size and mix.</p> <p>2. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average. Draft Policy DP1 addresses housing mix, with the intention of ensuring smaller housing which could facilitate downsizing.</p> <p>3. The draft Local Plan includes draft Policy DP1 which addresses the size and mix of dwellings and draft policies DP3-DP7 which address the various mechanisms to deliver affordable housing in Shropshire.</p> <p>4. Noted.</p>	No
LA008	B002	Updated Green Belt Topic Paper.	Pages 40-41	Not Specified	Not Specified	<p>1. Note that pages 40-41 states that steady growth is required to enable infrastructure improvements. However infrastructure improvements should happen before development happens.</p> <p>2. Releasing Green Belt land for development that has been earmarked in a Neighbourhood Plan contravenes that plan. Local People will have no confidence in the value of Neighbourhood Plans.</p>	<p>1 & 2. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p>	No
LA008	B003	Updated Housing and Employment Topic Paper.	General comments	Not Specified	Not Specified	<p>1. Concerned as to the practicalities of delivering employment land and ensuring it provides suitable employment.</p>	<p>1. Noted. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable.</p>	No
LA008	B004	Updated Additional Sustainability Appraisal of the Shropshire Draft Local Plan Report.	General comments	Not Specified	Not Specified	<p>1. Concerned the documents do not address the infrastructure needs to support development in communities.</p> <p>2. Concerned there would be strain on health services as a result of housing development for the unmet need in the Black Country.</p> <p>3. Concerned with the location of employment land is along main arterial routes, creating dormitory communities rather than vibrant local communities.</p> <p>4. Housing should be more energy efficient, concerned there is no mention in the appraisal of the use of renewable energies.</p> <p>5. Concerned that this document does not acknowledge that it contravenes Shifnal's Neighbourhood Plan policies.</p>	<p>1. Draft Policy DP25 specifically addresses infrastructure provision.</p> <p>2. Shropshire Council considers that a robust and proportionate site assessment process has been undertaken and this has identified appropriate sites to accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country. It also provides a clear explanation of the decision making applied in reaching these conclusions. These processes are summarised within sections 12 of the additional Sustainability Appraisal (SA) work and sections 9 (housing) and 15 (employment) of the Housing and Employment Topic Paper.</p> <p>3. Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable, and deliverable.</p> <p>4. The draft Shropshire Local Plan contains a range of policies which seek to ensure that development in Shropshire achieves a high-quality design and minimises carbon emissions.</p> <p>5. The Shropshire Local Plan works alongside the aspirations of Neighbourhood Plans where they share the same plan period. In the case of Shifnal, their Neighbourhood Plan covers the period to 2026, in line with the SAMDev Plan, and therefore there is a need for the Council to plan effectively for a further 12 years to the end of the new plan period to 2038. In this case, the Shropshire Local Plan provides a development strategy for this area.</p>	No
LA008	B005	Draft Policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.		Not Specified	Not Specified	<p>1. The Draft Policy as currently written will not ensure that accessible and adaptable housing is provided in every community. Request that on sites of 5 or more dwellings, the quota built to M4(3) should be changed to 10% or a minimum of 2 dwellings to ensure better provision in smaller rural developments.</p> <p>2. The Draft Policy is based on meeting current demand, the policy should be based on meeting future need which will be higher than current rates as identified in the policy.</p>	<p>1. The Council considers the proposed thresholds are appropriate. The thresholds identified for the 'categories' of housing within which proportionate provision of appropriate forms of specialist housing is required are responsive to both our understanding of the nature of development schemes that occur in Shropshire and the concept of achieving multi-generational and inclusive communities.</p> <p>2. Noted. Evidence within the Strategic Housing Market Assessment (SHMA) indicates that Shropshire has a higher proportion of older people within the population than the national average and it is forecast that this proportion will increase faster than the national average.</p>	No

5. Schedule 3: Respondents



Respondents Submitting Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
A001	Kieran	Brown				
A002	Jennifer	Brown				
A003	Roger	Clem				
A004	Bryn	Pryce	Natural Resources Wales	Bryn	Pryce	Mid Planning
A005	Jenna	Munday	Broseley Town Council			
A006	Howard	Horsley				
A007	Russ	Cockburn				
A008	Ros	Keeton				
A009	Christine	Pitchford				
A010	Michael	Pitchford				
A011			Taylor Wimpey	Darren	Oakley	RPS
A012	Lesley	Taylor				
A013			DIO	James	Beverley	Fisher German
A014	Verity	Wood	Vistry Group	Jessica	Herritty	Turley Associates
A015	Anthony	Kingston				
A016	Andrew	Smith				
A017	Robert	Watson				
A018	Ben	Green	Woodland Trust			
A019	Willem	Van Eekelen				
A020	Susan	Taylor				
A021	Peter	Snowdon				
A022	Neil	Hansen	National Highways			
A023			Persimmon Homes	John	Pearce	Harris Lamb
A024	Geoffrey	Catling	Albrighton Development Action Group			
A025	Stephen	Bott				

Respondents Submitting Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
A026	Samantha	Hughes				
A027	Paul	Constantine				
A028		Butters, Croom and Giladoni		Jon	Imber	JMI Planning LTD
A029	Dipika	Price				
A030	Olivia	Kimbell				
A031	Lesley	Durbin	Much Wenlock Neighbourhood Plan Refresh Group			
A032	Jane	Kyle				
A033	Ian	Higgins				
A034	Anne	Barclay				
A035	Kathryn	Hobday				
A036	Ceris	Crum				
A037	Charlie	Blakemore				
A038	Claire	Lakin				
A039	Jill	McCallum				
A040	Elizabeth	Boden	Historic England			
A041	Suzanne	Jarvis	Albrighton and District Civic Society			
A042	Julie	Hodgkiss	Bayston Hill Parish Council			
A043	Megan	Streets	Gladman Developments Ltd			
A044	Peter	Leaver	Nurton Developments Ltd			
A045	Matt	Lakin	Albrighton Village Action Group			
A046	Christopher	Martin				
A047	Christopher	Keeton				
A048	Melanie	Lindsley	The Coal Authority			
A049	David	Cadman				
A050	David	Standley				
A051	Edward	Turner				
A052	Elaine	Harris				

Respondents Submitting Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
A053	Emma	Byrne				
A054	George	Bagley				
A055	Jacqueline	Baker				
A056	James	Hughes				
A057	Jane	Caine				
A058	Nicola	Richardson				
A059	Alison	Ford				
A060	Jeni	Kingston				
A061	Michael Alan	Cook				
A062	Christine	Cook				
A063	Teri	Trickett	Bayston Hill Residents Against BAY039			
A064	Frances	Lonsdale				
A065	Claire	Stirk				
A066	Colin	Noakes				
A067	Angela	Davis				
A068	Bram	Davis				
A069	Alex	Smith				
A070	Max Zoe	Whitehead Curnow	Bloor Homes Ltd Taylor Wimpey UK Ltd	Jonathan	Burns	Pegasus Group
A071	Anne	Twynam				
A072	Sharon	Barker				
A073			AFM Farming LLP	Stuart	Thomas	Berrys
A074		Maiden		Amy	Henson	Berrys
A075			Boningale Homes	Megan	Wilson	Marrons
A076			Bellway Homes Limited	Reiss	Sadler	Marrons
A077			Bradford Estates	Stuart	Thomas	Berrys
A078	Anthony	Stirk	Chartered Surveyor			
A079	Andrew	Coley	Bridgnorth Civic Society			

Respondents Submitting Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
A080	Louise	Brierley				
A081	Julie & Janet	Bromley				
A082	Jessica	Bussey				
A083	Tracy	Humphreys	Canal & River Trust			
A084	Isobel	Carter	SACWG			
A085	Henry	Carver	Save Bridgnorth Green Belt / Hobbins Management Co	Clive	Roberts	Kembertons
A086			Castle Green Homes	Paul	Williams	Mosaic Town Planning
A087	Nicolas	Laight	Central & Country (Alport Road) Ltd	Peter	Richards	Peter Richards & Co Ltd
A088	Darren	Hodson				
A089	Delphine	Lockley				
A090	Chris	Corbett				
A091			Fletcher Homes	Amy	Henson	Berrys
A092	Barry	Price	H P Price & Sons	Nick	Williams	Berrys
A093	Robert	Harrop	Harrop Buckley Designs Ltd			
A094			Harworth Group	Richard	Brown	Pegasus Group
A095	Hayley	Price				
A096	Helen	Holloway				
A097	Holly	Harrison				
A098	Ian	Dale				
A099			JC & MW Suckley	Amy	Henson	Berrys
A100	Joanne	Jordan				
A101	John	Whalley				
A102	Jonathan	Holdcroft				
A103		Jones & Hayward		Peter	Richards	Peter Richards & Co Ltd
A104	Julie Lynn	Hoole				
A105	Stuart	Field	L&Q Estates	Sam	Gale	Lichfields
A106	Norma	Rowland				

Respondents Submitting Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
A107	Ron	Murdoch				
A108	Mary	Hancox				
A109	Saskia	Street				
A110	Elise	Bailey				
A111	Annette	Quilter				
A112	Joy	Howell				
A113	Michael	Davey				
A114	Marion	Abbott				
A115	Richard	Abbott				
A116	Elzbieta	Sedzik				
A117			Barwood Development Securities Ltd (Barwood Land)	Sarah	Butterfield	Pegasus Group
A118	Clare	Bolitho				
A119			Bradford Estates	Paul	Rouse	Savilles
A120	Clare	Turner	Bridgnorth Town Council			
A121	Stephen	Carey				
A122	Matthew	Rhodes	CEG	Stuart	Thomas	Berrys
A123			Churchill Retirement Living	Damien	Lynch	Planning Issues
A124	Marion	Coleman				
A125	Amy	Cook				
A126	John David	Cotterell				
A127	Charles	Green	CPRE Shropshire			
A128	Caroline V	Foster				
A129	David	Franklin				
A130	Derek	Harris				
A131	David	Twist				
A132	David	Jones				
A133		Thurbin & Charnock	Dickins Acre Partnership	Peter	Richards	Peter Richards & Co Ltd

Respondents Submitting Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
A134	Mark	Duncombe				
A135	Kirsty	Dorward				
A136	William	Foster				
A137	Judith	Gittings				
A138			Gleeson Land Ltd	Stuart	Crossen	Cerda Planning Ltd
A139	Ashleigh	Genco	Harrow Estates	Will	Charlton	tor&co
A140	Angela	Newey MRTPI	Herefordshire Council			
A141	Matthew	McShane	Highley LVA LLP	Jemma	Shorrocks	Boyer
A142	Rachel	Danemann	Home Builders Federation	Rachel	Danemann	House Builders Federation
A143	John	Humphries				
A144	James	Cook				
A145	Pauline	James				
A146	Jane	Maclachlan				
A147	Paul	Jarvis				
A148	Danny	Jenks				
A149	Jeremiah	Twomey				
A150	John	Pritchard		Stuart	Thomas	Berrys
A151	Clive	Hoole				
A152	Julie	Richards				
A153			1 Shifnal Matters, 2 Shifnal Town Council, 3 Tong Parish Council	R	Brogden	Bruton Knowles
A154	Ann	Talbot				
A155	Deborah	Ashurst				
A156	Geraldine	Cotterell				
A157	John	Burmer				
A158	Julia	Sephton				
A159	Kimberley	Kimbell				
A160	John	Hallett				

Respondents Submitting Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
A161	Linda	Banks				
A162	Janet	Bromley				
A163	Janet	Pinder				
A164	Barry	Newby				
A165	Elizabeth	Mistry				
A166	Helen	Jarvis				
A167	David	Worrall				
A168	Holly	Pleydell				
A169	Maxine	Lawrence				
A170	Pamela	Newby				
A171	Karen	Dorward				
A172	Lee	Dorward				
A173	Tamara	Bailey				
A174	Lisa	Flay				
A175	Glen	Flay				
A176	Jennifer	Blakstad				
A177	Bridie	Beet				
A178	Helen	Franklin				
A179	Madeline	Bailey				
A180	Willouse	Keeley				
A181	Martin	Bailey				
A182	Natasha	Bailey				
A183	John	Lockley				
A184	Mervyn	Lacey				
A185	Lesley	Martin				
A186			Leverhulme Hesketh Trust	Oliver	Neagle	Strutt & Parker
A187	Lindsay	Meanley				
A188	Lindsey	Cooke				
A189	Lisa	Millar				

Respondents Submitting Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
A190	Lorraine	Price				
A191	Kieron	Gregson	Lovell Strategic Land			
A192	Penny	Brasenell	Ludford Parish Council			
A193	Luke	Waldram				
A194	Margaret	Brewin				
A195	Kate	Mandy				
A196			Manor Oak Homes	Geoff	Armstrong	Armstrong Rigg Planning
A197	Marjorie	Bunmer				
A198	Mark	Crascall				
A199	Mark	Taylor				
A200	Martin	Lonsdale				
A201	Matt	Lakin				
A202			Mattell Trustees	Stuart	Thomas	Berrys
A203			McCarthy Stone	Natasha	Styles	The Planning Bureau Limited
A204			McGowan Grocott Land & Property	Peter	Richards	Peter Richards & Co Ltd
A205	Melina	Timmins				
A206			Metacre and Beth Wilson, Jennifer Martin-Jones, Benjamin Brown and Georgina Bright	Simon	Handy	Strutt & Parker
A207	Michael	Davis				
A208	Michael	Price				
A209			Midlands Partnership Foundation NHS Trust (MPFT) and Shropshire Community NHS Trust (SCHT)	David	Carter	Tyler-Parkes
A210	Michael	Grace				
A211			Miller Homes	Georgina	Kean	Turley
A212	John	Moore	Shifnal Matters			
A213	Lorraine	Moore				

Respondents Submitting Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
A214	Elizabeth Sarah	Lowé Evans	Morris Property	Stuart	Thomas	Berrys
A215	Colin Peter & Gordon	Weston		Edward	Landor	Landor Planning Consultants Ltd
A216	Margaret	Humphries				
A217	Susan	O'Dowd	Much Wenlock Civic Society			
A218	Steve	McDermott	Morville Parish Council			
A219	J & F	Davies		Amy	Henson	Berrys
A220		Redge		Amy	Henson	Berrys
A221	C	Jones		Michael	LLOYD	Berrys
A222	Steve	Constable		Michael	LLOYD	Berrys
A223	Trudi	Barrett	Much Wenlock Town Council			
A224			Muller Property Group	Amy	Henson	Berrys
A225	Natalie	Perry				
A226	Natasha	Smith Agüero				
A227			National Trust	Claudia	Clement-Benfield	National Trust
A228	Gage	Naylor				
A229	Neil	Byrne				
A230	Nicholas	Price				
A231	Oliver	Meanley				
A232	Alex	O'Neill		Stephen	Locke	Stephen Locke Associates
A233	Saffron	Rainey	Oswestry Civic Society			
A234	Peter	Ford				
A235	Patricia	Williams				
A236	Patricia	Smith				
A237	David Barry	Smith				
A238	Pankjai	Patel				
A239	Susan	Patel				

Respondents Submitting Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
A240	Pamela	Cadman				
A241	Patrick	Howell				
A242	Paul	Harris				
A243	Paula Mary	Davies				
A244	Jonathan	Perry				
A245			Persimmon Homes and Taylor Wimpey	Jason	Tait	Planning Prospects Ltd
A246	Malcolm	Philpotts	Formerly (AGBPG)			
A247	Philip	Pledger				
A248	Tom	Bowker	Plas Foxen Homes	Peter	Richards	Peter Richards & Co Ltd
A249	Gary	Pritchard				
A250			The Raby Estate	Doug	Hann	WSP
A251	Rebecca	Jenks				
A252			Redrow	Mike	O'Brien	Pinnacle Planning
A253	Richard	Hughes				
A254	Mark	Richards				
A255	Laura	Richards				
A256	Penny	Richardson				
A257	David	Robertson				
A258	Tony	Rowland				
A259	Ruth	Crascall				
A260	Mervyn	Eyles	Ruyton XI Towns PC			
A261	S. & D.	Evans & Phillips		Michael	Lloyd	Berrys
A262	Sheila	Lacey				
A263	Sally	Tildesley				
A264			Salop Leisure Holdings Ltd	Stuart	Thomas	Berrys
A265	James	Thompson	Sansaw Estate	Stuart	Thomas	Berrys
A266	Sarah	Evans	Morris & Company	Guy	Maxfield	Maxfield Bros

Respondents Submitting Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
A267	Jeremy	Shingler	Shingler Homes	Nigel	Thorns	Nigel Thorns Planning Consultancy
A268	Simon	Baker				
A269	Sophie	Reeves				
A270			Stanmore Consortium	Mike	Hopkins	JLL
A271	Stephen	Czira				
A272	Stephen	Ives				
A273	Stephen	Kimbell				
A274			Stonebond Ltd	Sian	Griffiths	RCA Regeneration Limited
A275	Stuart	Moore				
A276	Susan	Sutherland				
A277	Theresa	Harris				
A278	Bill	Griffiths	Tasley Parish Council			
A279	John	Beardsell	Terra	Richard	Purser	Plan Red
A280			The Strategic Land Group Ltd	John	Coxon	Emery Planning
A281	Alan	Thompson				
A282	Tina	Mirley				
A283	Angela	Tindall				
A284	David	Tindall				
A285	Marylyn	Silver	Tong Parish Council			
A286	Trevor	Tarran				
A287	David	Turner				
A288			Wain Estates	Mike	O'Brien	Pinnacle Planning
A289	Debbie	Walters				
A290	Simon	Warrilow				
A291	I	Warrington				
A292			Wenlock Estates	Stuart	Thomas	Berrys
A293	Helen	Belton	Weston Rhyn Parish Council			

Respondents Submitting Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
A294	Brian	Williams				
A295	William	Wilkinson				
A296	Connor	Furnival	Worfield & Rudge Parish Council			
A297	Ternanda Christina	Jara-Cazares				
A298	Marilyn	Higson				
A299	Graham	Higson				
A300	Rosemary	Jones				
A301	Matias	Camacho Parrilla				
A302	Jane	Nicholson				
A303	Stephen	Nicholson				
A304	Clare	Pomeroy				
A305	Jennifer	Wright				
A306	Michael	Nicholson				
A307	Daphne	Wigget				
A308	Susan	Wright				
A309	Douglas	Wright				
A310			Bridgnorth Aluminium	Mike	Hopkins	JLL

Respondents Submitting Non-Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
LA001	Andrew	Rogers	Shropshire Homes			
LA002	Stephen	Woodward				
LA003	Jackie	Woodward				
LA004	Anne	Howls	Baschurch Parish Council			
LA005	Iona	Colvin				
LA006	Robert	Hodges				

Respondents Submitting Non-Duly Made Responses						
Part A Reference	Respondent Details			Agent Details (if applicable)		
	First Name	Last Name	Organisation (if applicable)	First Name	Last Name	Organisation
LA007			Oswestry Rural Parish Council			
LA008	Bridget	Laraway	Selattyn and Gobowen Parish Council			