

Shropshire Local Plan Review

Issues and Strategic Options Consultation Response Summary

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Shropshire Local Plan Review - Issues and Strategic Options

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Introduction

Following approval from Cabinet on the 18th January 2017, consultation documents for this initial stage of the Local Plan Review were published on 23rd January 2017 for a period of eight weeks.

This stage of consultation sought views from all parties on the key issues and strategic options for the Local Plan Review; it covered the following strategic options:

1. Housing requirement;
2. Strategic distribution of future growth;
3. Strategies for employment growth; and
4. Delivering development in rural settlements.

During this issues and strategic options consultation, a total of 412 unique respondents commented. Respondents included individuals; businesses; landowners; Town and Parish Councils; representatives of the development industry; organisations; neighbouring Authorities; and statutory consultees. These responses will be used to inform the preparation of 'Preferred Options' for the Local Plan Review.

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

Housing requirement and strategic distribution options

Calculating Housing Need

Question 3 sought views on whether the Full and Objectively Assessed Housing Need (FOAHN) identified for Shropshire between 2016 and 2036 was appropriate and in line with national guidance. Of the 412 unique responses received, 228 specified whether they did or did not agree with the Shropshire Council calculation of the FOAHN. Of these respondents, there was an approximate 50-50 split between those that did and those that did not agree with the calculation.

Of those respondents that considered the Shropshire Council FOAHN was appropriate and in line with national guidance, the main comments received were:

- The FOAHN has been calculated using a robust assessment methodology which is in line with current national guidance.
- The level of housing to be delivered is driven by need, so equally the types of housing delivered should also reflect local needs.
- The FOAHN calculation should be updated to incorporate the 2014-Sub National Household Projections (SNHP).

Those respondents who did not agree with the Shropshire Council calculation of the FOAHN consisted of a mix of those who felt the calculation was too high (approximately 45% of these respondents, mainly community groups; organisations; Town and Parish Councils and individuals); those who felt the calculation was too low (around 23% of these respondents, mainly developers, landowners (many of which were represented by agents)); and those who disagreed for other reasons or it was unclear whether they felt the calculation was too high or low, (around 32% of these respondents, mainly community groups; Town and Parish Councils; and individuals).

The main comments made by those who felt that the calculation was too high included:

- The methodology is not transparent, adjustments are based on questionable evidence and the resultant need is therefore too high.
- In-migration rates are too high and fail to reflect the implications of the UK's exit from the EU (Brexit).
- Market signals indicate that no adjustment is required in response to them.
- Employment data indicates that household projections result in a labour force which exceeds job formation.
- National assumptions made on household sizes are incorrect and artificially increase housing need.
- The FOAHN should not exceed the SNHP – although some expressed concern about the validity of these projections as past Government projections have consistently exceeded actual need.
- The adjustment to reflect the current percentage of vacant/second homes experienced within the housing stock in new housing provision is incorrect. Rather this figure should be reduced (for both current and new housing stock) reflecting policies to reduce vacant homes.
- The adjustment made in response to the presence of the University Centre: Shrewsbury and expected retention rates of graduating students is too high. Any increased need resulting from the University Centre: Shrewsbury should be provided within Shrewsbury itself.
- Concern about the implications for the built and natural environment.
- Concern about the capacity of infrastructure to support new development.

The main comments by those who felt that the calculation was too low included:

- There is a need to make further adjustments in response to market signals.
- There is a need to make adjustments in response to the high affordable housing need identified.
- There is a need to make adjustments in order to ensure a sufficient labour force to meet future jobs growth.
- There is a need to make adjustments in response to past under-delivery.
- The SNHP which informed the FOAHN should be updated from the 2012-SNHP to the 2014-SNHP.
- The calculated FOAHN should consider adjustments proposed within the methodology proposed by the Local Plan Expert Group (LPEG) to Government, which has informed the decision made by Government to introduce a standard methodology for the calculation of FOAHN.
- There is a need to consider unmet housing need within adjacent Local Authorities / Housing Market Areas.
- The FOAHN will need to be re-assessed following the publication of Governments standard methodology for the calculation of housing need.

The main comments made by those who disagreed for other reasons or it was unclear whether they felt the calculation was too high or low included:

- An expression of concern about the implication of the identified housing need on rural settlements and the countryside.
- Uncertainty about the capacity of existing infrastructure to support the identified housing need.
- The need to deliver necessary affordable and low cost housing to meet local needs.
- Concern that a national methodology for calculating housing need does not reflect locally specific circumstances in Shropshire.

Of the many respondents who either did not indicate whether they agreed or disagreed with the methodology or specified that did not know the answer/had no opinion, approximately a third provided an explanation for their position. The main reasons expressed included:

- The respondent felt that they could not comment without a more detailed understanding of the methodology.
- Government has announced that a new standard methodology for the calculation of housing need will be published and the implications of this methodology will need to be considered when establishing a housing requirement.
- The calculated FOAHN exceeds the SNHP.
- The FOAHN has been calculated by professional officers at Shropshire Council and these officers are trusted to calculate the FOAHN correctly.
- National guidance on how to calculate housing need is inappropriate.

The Housing Requirement

Question 4 sought views on overall housing requirement options between 2016 and 2036. In total 327 respondents expressed an opinion on this question. Of those who responded 47% favoured the 'Moderate Growth' option equating to 26,250 dwellings over the Plan period; 12% favoured the 'Significant Growth' option equating to 27,500 dwellings; 32% responses favoured the 'High Growth' option equating to 28,750 dwellings; and 9% responding did not choose an option.

Of those favouring 'Moderate Growth' (Option 1):

- A number of responses considered this option most closely equated to current development trends.
- A consistent theme was the need to address local needs, and in particular to support development of affordable and low cost housing in rural areas, ahead of encouraging further in-migration.
- The provision of timely infrastructure was discussed in several responses, with respondents citing the difficulty in delivering new infrastructure, particularly with higher growth options.
- The need for some additional development in the rural area was a feature of several responses, although other responses argued that rural areas lacked sufficient public transport.
- There was also concern expressed about the loss of rural space and the need to protect the environment. Others suggested that making the best use of brownfield sites and existing premises should be prioritised.
- Other respondents questioned the deliverability of higher growth options.

Fewer respondents supported 'Significant Growth' (Option 2) compared with the other two options. Of those who did support this option:

- There was concern expressed about whether the lower housing option (Option 1) would meet needs.
- It was accepted that with this option the proposed requirement would be deliverable and would promote the delivery of towns whilst protecting assets, such as the Shropshire Hills AONB.

Of those respondents who supported 'High Growth' (Option 3):

- A number of respondents pointed out that the proposed annual requirement for this option represented less growth than projected for the second half of the current Core Strategy plan period.
- It was also suggested that expected adjustments in the manner in which the FOAHN is calculated would likely lead to a higher housing need for the County.
- It was argued by several respondents that this option presented the greatest degree of flexibility in providing a range of site allocations and would support inward investment.

A number of other comments provided contrasting views on the validity of all the options, primarily based upon alternative suggestions about the housing need for the area; several thinking there should have been a lower option and several thinking the highest option did not go far enough.

The Spatial Distribution of Development

Question 5 sought views on the strategic options on how development could be distributed across the County. In total 338 respondents expressed an opinion on this question. Of those who responded 34% favoured 'Rural Rebalance' (Option A); 37% favoured 'Urban Focus' (Option B); 21% favoured 'Balanced Growth' (Option C); and 8% commented without providing a preference.

Of those who favoured 'Rural Rebalance' (Option A):

- Many considered this distribution most closely reflected the current development strategy, and it was appropriate to continue with an approach which struck a good balance between Shrewsbury, the market towns and the rural area, and that there was little evidence to suggest a deviation.
- Several comments cited the need to sustain rural services and facilities as a reason to continue to pursue 35% of housing to the rural area.
- Several responses argued this option presented the widest possible selection of sites and the greatest opportunity to deliver housing;
- Other comments questioned the effectiveness of how the rural rebalance approach has worked in practice, whilst others suggested the strategy should reflect the fact that the County's rural nature was one of the key reasons people want to live in Shropshire and therefore opportunities to grow rural communities should be maintained.

Of those who favoured 'Urban Focus' (Option B):

- Many argued this option would help push development to more sustainable settlements with better access to infrastructure provision and employment opportunities. In this way it would help to reduce commuting levels.
- Many argued this option would be most positive for protecting rural areas and for utilising brownfield land.
- Several comments argued that the towns offered better infrastructure provision, including access to a range of services and facilities, although conversely concern was also expressed about the infrastructure capacity of some market towns.
- Some comments suggested this option represented the best chance to utilise the opportunities presented by Shropshire's proximity to HS2, the Midlands Engine,

the Northern Powerhouse, and the West Midland conurbation, particularly for the northern and eastern parts of the County.

- Respondents suggested that a Green Belt review would be needed to achieve this option.
- With regard to Shrewsbury, comments suggested that there should be an emphasis on further delivery within and on the edge of the town, and that growth of the University Centre: Shrewsbury presented a positive opportunity.
- There were also some general comments regarding the need to ensure growth is not to the detriment of heritage and environmental considerations.

Of those supporting 'Balanced Growth' (Option C):

- As with Option B, many felt this option benefitted from pushing development to Shrewsbury, as it was argued the town's infrastructure and employment opportunities would be best placed to support a high growth option.
- It was argued that new housing in urban areas is less likely to have an impact on the Strategic Road Network due to reduced trip generation, but that mitigation measures are likely to be needed to the Strategic Road Network in Shrewsbury.
- Several comments supporting the balanced approach discussed the need to sustain essential rural development, such as for rural workers, but that the current approach of rural rebalance has often led to development in unsustainable locations. Some felt this option presented an opportunity to deliver gradual growth in villages rather than larger scale development.
- Other comments included the need to give priority to brownfield land and using empty properties.

Other comments received:

- Consideration should be given to further dividing the market towns/key centres category to reflect the differences in population, facilities and services between these towns.
- Some alternative options were presented which ranged from considering more growth in Shrewsbury (up to 40%) to providing an option between Urban Focus and Balanced Growth.
- Other comments suggested the Shropshire Hills AONB should be clearly distinguished in the options, and that there would need to be consideration of the impacts on amenity and the built and natural environment in the preferred options.

Economic growth and employment

Strategic Options for Economic Growth

Question 6 sought views on how Shropshire might best exploit new growth opportunities arising from proposed investments outside the County and what challenges might be encountered in seeking to capitalise on these opportunities. Of the 412 individual responses received, a total of 222 (54%) of respondents expressed an opinion on this question and raised the following matters.

Shropshire is advised to capitalise on new growth opportunities by:

- Promoting the County at national and regional levels to seek to capture investment and to support key growth sectors which generally encompass:
 - Agricultural innovation and high quality food production;
 - Tourism linked to the high quality natural, historic and cultural assets of the County;
 - High quality professional and technical services; and
 - Research and development with incentives to attract such high value uses.
- Delivering a high growth strategy defined by the following important characteristics:
 - An urban focus to locate opportunities where investment is likely to be delivered;
 - Providing a good range and choice of suitably located and deliverable employment land and premises with attractive and accessible strategic investment at sites such as Ironbridge Power Station; Clive Barracks; and locations like the M54/A41 road and rail corridor;
 - A choice of good quality housing to meet the full range of housing needs supported by modern retail and leisure services;
 - High quality education and training opportunities including further education (FE), higher education (HE) and vocational training e.g. apprenticeships; and
 - Delivering improvements to the highway and public transport networks, including improvements to the A49 north and south of Shrewsbury, dualling of the A5 to Oswestry and Chester and provision of the Shrewsbury North West Relief Road.
- Managing travel patterns to support sustainable economic growth with:
 - Balanced, mixed use development in key growth locations; and
 - Promoting sustainable travel behaviour e.g. Travel Plans.

Shropshire is advised to consider the challenges of these growth opportunities:

- Economic investment should be located to benefit the resident population.
- Migration into the County will age the population but retired or semi-retired people move in response to the national housing market and bring economic benefits.
- All strategies should recognise that Shropshire is an agricultural County with a strong tourism economy based on high quality natural and historic environments.
- Shropshire's relative isolation means that external influences will probably benefit only specific areas of the County and take effect late in the plan period.
- Shropshire's isolation might be best addressed by designating Enterprise Zones.

Other comments received suggest it is important to recognise that:

- Managing the challenges of competing in an international market will require The Marches Local Enterprise Partnership (LEP) and the West Midlands Combined Authority (WMCA) individually and jointly to collaborate more closely to promote the regional economy.
- Brexit will challenge us to consider:
 - How to better manage the impacts of climate change in the County;
 - Large sites in accessible locations for inward investment and business growth;
 - Providing incentives for infrastructure investment and economic development; and

- Attracting significant international tourism into the County.
- Shropshire has potential catalysts for growth e.g. RAF Cosford and the M54/A41.
- The rate of growth will be influenced by the pattern of infrastructure investment.

Question 7 sought views on the range of opportunities and challenges likely to be encountered in seeking to promote economic growth in Shropshire over the period to 2036. Of the 412 individual responses received, a total of 196 (47.6%) respondents expressed an opinion on this question and raised the following matters.

The principal challenges were considered to be:

- Managing the impacts of the decision and the terms of Brexit, given the limited assistance provided by Government.
- Competition from Wales, Cheshire, Staffordshire, West Midlands and Telford seeking to capitalise on investment opportunities created by HS2 and potential development zones in the North-West and West Midlands.
- The need for a Green Belt Review to identify potential opportunities in east Shropshire to support growth and investment in the County.
- A combination of effects on our productivity (Gross Value Added or GVA) from an ageing population, a declining and lower skilled workforce, low technology enterprises offering lower paid employment and out-commuting / out-migration by the economically active - especially younger people.
- The need to provide a suitable range and choice of employment land and premises to satisfy a broad spectrum of investment demands supported by investment in the capacity of our physical, social and communications infrastructure.

The principal opportunities were considered to relate to the positive effects of:

- The political and administrative co-ordination across The Marches LEP (and potentially with Wales) to strengthen and diversify the sub-regional economy and draw positive economic and social outcomes from migration and commuting.
- Focusing development into the strategic corridors of the M54/A41/A5/A49/A53 to capture the benefits of national and regional investments, to capitalise on significant investment locations like i54, T54 and RAF Cosford and new investment sites such as Ironbridge Power Station and Clive Barracks.
- Conserving and promoting Shropshire's rich natural, historic and cultural environments to sustain recreational, leisure and tourism resources and to provide quality of life benefits.
- Opportunities to deliver effective strategies to meet the needs of communities for:
 - Open market and affordable housing needs in sustainable locations;
 - Employment land and premises to meet a broad spectrum of demand and to balance the delivery of housing;
 - Good quality broadband provision and the earliest access to new technologies (including 5G communications) to provide digital support for business including flexible working spaces and home working and for contemporary lifestyles;
 - Timely provision of investment to improve the capacity of physical, social and communications infrastructure;
 - Sustainable energy solutions and achieving energy conservation targets; and
 - Quality of life improvements especially conserving high quality environments and managing the change and growth of the built environment.

Other comments received:

- Sought an urban focus to deliver thriving Market Towns and vibrant town centres.
- Support for business innovation with a universal Shropshire brand especially for agriculture, food and drink production and tourism.
- Access to high quality FE and HE and vocational training opportunities.

Question 8 sought views on the most appropriate aspiration for the growth of the Shropshire economy between 2016 and 2036 and in total, 303 of the respondents expressed an opinion on this question. Of these, 19% favoured an option for significant growth based on the current level of aspiration for development and new jobs in the adopted Local Plan and 24% favoured an option for high growth to deliver a higher level of new jobs. The highest level of support (35%) was for an option to deliver productivity growth by capturing new investment and delivering higher value employment. Of those who responded, 22% did not choose an option.

Those in favour of 'Significant Growth' (Economic Option 1) considered it would:

- Sustain a recently adopted, robust and aspirational strategy drawing on an identified supply of employment land allocations to maintain a rate of development sufficient to meet the economic needs of the County.
- Better address the:
 - Challenges of the decision and the terms of Brexit; and
 - Specific employment needs of the economically active resident population whilst providing for some higher value employment for those attracted to the County.
- Have to address the need to:
 - Achieve balanced growth along with the preferred housing requirement;
 - Provide flexible policies and a choice of sites to attract high value investment; and
 - Deliver the existing employment allocations.

Those in favour of 'High Growth' (Economic Option 2) considered it would:

- Promote the highest level of growth offering the capacity to balance the demands placed on our principal settlements with the needs of the rural areas.
- Facilitate the identification of an attractive range and choice of employment land and premises to offer choice and flexibility to the market.
- Enable the market to deliver flexible opportunities to secure a range of readily available serviced sites across the County.
- Support the expansion and relocation of existing businesses and attract new inward investment into the County.
- Have to address the need to:
 - Balance high growth in housing with achievable economic aspirations;
 - Promote sustainable growth in rural settlements to support local businesses; and
 - Deliver agricultural expansion and innovative rural businesses whilst conserving the attractive rural environment of Shropshire.

Those in favour of 'Productivity Growth' (Economic Option 3) considered it would:

- Be a 'step change' in economic performance to improve productivity.

- Be a truly aspirational strategy to encourage economic investment and create new and higher value employment whilst making an efficient use of land.
- Deliver high value jobs for a more skilled workforce if supported by:
 - Investment to deliver readily available employment land and premises;
 - Investment in high quality education and training services; and
 - The actual rate of development of employment land over the past 20 years.
- Have to address the need to:
 - Capture opportunities arising from investment in HS2 and the development zones of the North-West and West Midlands despite competition from neighbouring authorities;
 - Ensure Market Towns remain the focus of the strategy and seek to deliver new business parks to attract innovative new businesses particularly in 'edge of settlement' locations but favouring brownfield opportunities, where possible;
 - Focus on opportunities in settlements on strategic transport corridors especially the M54/A41 road and rail corridor at Shifnal, Albrighton and Cosford and links to significant sites at T54 and i54 including Jaguar Land Rover;
 - Deliver a broad based economy supported by new business growth, infrastructure investment and reduced out-commuting; and
 - Protect the quality landscapes and the attractive rural character of Shropshire.

Other comments received highlighted the need:

- To balance economic growth with:
 - An appropriate level of housing delivery;
 - The timely delivery of infrastructure investment especially telecommunications and the capacity and performance of the strategic road network;
 - Growth in all sectors including agriculture, tourism and leisure;
 - Support home working and the pursuit of an acceptable work/life balance; and
 - Recognition of the objectives set out in community plans for local areas.
- To test the economic baseline forecast (in the FOAHN) against previous Shropshire growth rates and any other jobs growth forecasts for the County.
- For an Economic Development Needs Assessment (EDNA) and Employment Land Review (ELR).

Economic Objectives for Shropshire

Question 9 sought views on whether the strategic objectives in the adopted Core Strategy (Policy CS13) should influence the economic strategy in the revised Local Plan for the period to 2036. In total, 293 of the respondents expressed an opinion and 69% supported the current strategic economic objectives, 6% considered that these objectives were no longer appropriate and 25% were not sure.

The responses supporting the current Strategic Objectives advocated they were:

- Recently adopted and so provided certainty over the soundness of the strategy and should continue to support the long term planning of the County to 2036.
- Possibly deficient on a small number of contemporary matters like technological changes (e.g. 5G communications) and the impacts of Brexit.
- Sound because the objectives clearly identified the settlement hierarchy as the focus for development whilst recognising the specific needs of the rural economy.

- Responsible in managing a flexible and responsive supply of employment land and premises to meet business needs. Emphasis was placed on supporting key growth sectors and innovative new business investment to deliver a higher aspiration for growth. A land supply of only 5 years was advocated as 'responsive' to the market.

A small number of responses questioned the strategic objectives and raised points for consideration:

- Economic performance in The Marches LEP might benefit from a closer integration between the partner authorities especially Shropshire and Telford.
- Shropshire is adversely affected by the ageing of the population and by the small and relatively poorly paid working population driving our economic performance.
- Shropshire is a large and diverse rural County and a variety of local strategies might be required to satisfy the range of economic challenges in the County which might rely in some locations on community initiatives and volunteering.
- Shropshire should address the needs of the agricultural sector by supporting the provision of education and training for the farming community and supply chain businesses. A Shropshire 'brand' is needed for their products and services.
- Economic growth has a purpose in supporting the quality of life enjoyed by the communities of Shropshire but these benefits must be achieved alongside protection of the natural and historic environments.

Other comments received highlighted the opportunities arising from:

- The potential of national and regional investment to attract skilled working age migrants into principal settlements especially in north Shropshire.
- The potential of strategic corridors to support large mixed use developments possibly including a new settlement around M54 junction 3 in east Shropshire.
- The potential of new technologies to offer affordable and clean power for business including the use of 'electric' powered commercial transport.

Range and Choice of Remaining Allocations

Question 10 sought views on whether the 19 remaining, uncommitted employment allocations identified in Appendix 1 of the Consultation Document would still make a positive contribution to the employment land supply in the County between 2016 and 2036. In total, 289 of the respondents expressed an opinion, with 53% supporting the remaining allocations: of which 31% considered all the sites to be suitable and 22% considered that only some of the sites were suitable. Of the other respondents, 8% considered that all the sites were not suitable and 39% were not sure.

The positive contribution to be made by the uncommitted employment allocations was supported for the following reasons:

- These employment sites significantly strengthen the land supply in Shropshire but require flexibility about the permissible employment uses and the timing of delivery.
- Employment development has a longer lead in time than other forms of development such as housing and in some locations, employment sites have a need for significant infrastructure investment before development can commence.

- The employment sites are important because they:
 - Provide a range and choice of opportunities for small affordable start up premises, 'grow on' space and land for larger building formats;
 - Provide opportunities for other important activities like research and development or education and training; and
 - Future provision must include some smaller sites in less central locations to meet local needs, balance housing development and respect the character and setting of the location.
- The following uncommitted employment allocations were endorsed:
 - Bridgnorth: South of A458 - significant opportunities to support Stanmore Industrial Estate;
 - Market Drayton: Sych Farm - high quality serviced site with expansion potential;
 - Shrewsbury: the following are important investment opportunities:
 - SUE South;
 - SUE West – but not retail or roadside services;
 - Battlefield Road East - but not retail or roadside services; and
 - Wem: Shawbury Road - although this is located outside the town it is a significant opportunity.
- The following uncommitted employment allocations were not endorsed:
 - Oswestry: Whittington Road - proximity to Oswestry Innovation Park;
 - Oswestry: Innovation Park - countryside character. However, dualling of the A5 would greatly assist the delivery of this site;
 - Church Stretton: Springbank Farm - known constraints and the availability of potentially more viable sites;
 - Craven Arms: West of A49 and North of Long Lane - known constraints. However, both sites form logical extensions to the town;
 - Ludlow: East of Eco Park & South of Sheet Road - considered unnecessary until Eco-Park Phase 1 is completed;
 - Highley: adjoining Netherton Workshops - lack of demand for this site; and
 - Minsterley: Hall Farm - size of employment area in this mixed use site.

The uncommitted employment allocations were considered to raise the following issues:

- These are all good quality greenfield sites and their loss to employment use will generate significant movement of people creating traffic, noise and pollution.
- The volume of undeveloped land indicates a need for further evaluation of their viability and possible replacement to avoid demand for land and premises being displaced into less sustainable development locations.
- Provision must favour larger settlements or cluster around significant sites or locations in strategic transport corridors (e.g. M54/A41/A49/A53).

Other comments received highlighted the following matters:

- The use of significant nodes on the Strategic Road Network will require investment in the capacity and safety of highway network.
- Larger new sites should be located close to Cheshire and Staffordshire to capitalise on cross boundary demand.
- Employment land must be deliverable to balance the provision of new housing.

Protecting Existing Employment Land

Question 11 sought views on whether the protection provided to existing employment areas as a source of serviced and readily available land made a positive contribution to the supply of employment land and premises in Shropshire. In total, 276 of the respondents expressed an opinion, with 49% supporting the continuing protection of existing employment areas, 4% preferring the removal of the protection and 47% uncertain.

The protection of existing employment areas was considered an appropriate policy objective and the following points were made in support of this position:

- Existing employment areas make a significant contribution to the supply of employment land and premises contributing to the sustainability of settlements and reducing the need for greenfield land for employment development.
- It was considered that policy characteristics for protected sites should include:
 - Viable prospects for the continuing employment use of the site subject to the age and suitability of the buildings and the infrastructure capacity of the site;
 - Proven market demand for good quality business premises or buildings capable of re-use or adaptation to meet current market demands;
 - No greenfield land within the boundary of the protected site; and
 - Good highway accessibility.
- It was considered that the protection afforded to these sites should be strengthened to give certainty to the supply of land and premises and to deter speculative housing redevelopment.
- Additional protection should be tempered by a broader range of permissible employment uses particularly in relation to demand and take up of premises.
- Financial contributions from other types of development should be used to deliver infrastructure investment to sustain protected employment areas.
- The following protected employment areas were endorsed:
 - Craven Arms Business Park;
 - Ludlow Eco-Park, Phase 1;
 - Stanmore Industrial Estate, Bridgnorth; and
 - Sych Farm Phase 1, Market Drayton.

A number of cautionary comments were made in relation to:

- The need to re-assess employment policies, land allocations and protected employment areas to ensure the economic strategy is sound and deliverable.
- Flexibility in the protection of existing employment areas should facilitate the regeneration of urban areas.
- The provision of clear explanations of any flexibility in the protection of existing employment areas in policy and guidance to help the commercial property market.
- Protected employment areas would be more successful if businesses employed local people, used the local supply chain and received business rates exemptions.
- The following sites are considered to be suitable for protection:
 - Bank Top Industrial Estate and expansion land, St Martin's; and
 - Westgate former offices, Bridgnorth.

Rural policy

Identification of Community Hubs

Question 12 sought views on whether the approach and methodology (Appendix 2 of the consultation document) proposed to identify Community Hubs was appropriate. 239 of the 412 respondents specified whether they did or did not agree with the approach and methodology, with the majority (73%), indicating that they were supportive. The remaining 27% had concerns about either or both the approach and methodology.

The majority of respondents who did not address the question also provided no explanation for this decision; however a number of Parish Councils specified that they agreed with the approach and methodology but that they had concerns about how policies within Community Hubs would operate and ensure that future development was in appropriate locations and of an appropriate scale.

Many of the respondents who supported the approach and methodology proposed for the identification of Community Hubs, provided no specific comments. Of those that did, their comments can be summarised as follows:

- Some individuals; Parish Councils; and organisations made comments on the inclusion of specific services and facilities and/or the scoring of specific services and facilities. These comments varied with regard to the specific services and facilities discussed.
- Several landowners/developers (many of which were represented by planning agents) suggested that services outside but within proximity (the definition of proximity varied) of a settlement should be included within the scoring for that settlement.
- However a significant proportion of respondents, including individuals; Parish Councils; and landowners/developers (many of which were represented by planning agents) felt that the methodology covered the major services and facilities required for a sustainable community.
- A significant proportion of respondents considered that the methodology was logical and simple to understand. This included individuals; Parish Councils; and landowners / developers (many of which were represented by planning agents).
- A number of individuals and Parish Councils specified that they supported the proposed methodology for identifying Community Hubs, but that the final decision to opt-in should remain with the relevant community.
- Conversely many individuals; and landowners/developers (many of which were represented by planning agents) felt that the proposed approach and methodology would result in a more objective assessment of whether a settlement functions as a Community Hub than an opt-in approach.
- Some landowners/developers (many of which were represented by planning agents) suggested that the assessment should also allow settlements that are not identified as a Community Hub to opt-in.
- A range of respondents including individuals; Parish Councils; and landowners / developers (many of which were represented by planning agents) stated that the proposed approach and methodology would encourage development in sustainable locations.
- A small number of respondents suggested that the methodology needed to reflect changing circumstances, with two differing perspectives presented. Some

respondents stated that it needed to reflect improving provision, where services and facilities are gained; whilst others suggested that it needed to reflect worsening provision, in circumstances where services are lost. A few respondents also suggested that the assessment should be dynamic or regularly updated.

The main reason that individuals and Parish Councils opposed the proposed approach to identifying Community Hubs was that they felt the decision should be made by the relevant community using an opt-in/opt-out approach similar to that proposed for Community Clusters.

Other concerns about the approach and methodology are summarised below:

- A number of individuals specified that they disliked the concept of Community Hubs.
- Several individuals and Parish Councils expressed concern about the proposed scoring for specific services/facilities. The services/facilities referred to varied from respondent to respondent.
- Several individuals and Parish Councils also specified that the ability of road infrastructure to service new development should be considered within the assessment.

Identification of Community Clusters

Question 13 sought to identify opinions on whether any of the existing Community Clusters should no longer have that status.

Only 147 of the 412 respondents addressed this question but of these, the majority (80%) did not support a change to the status of existing Community Clusters. Of those respondents who did consider that a change was appropriate, the key themes included:

- Whilst a number of Parish Councils indicated that they were content with their existing clusters, others wished to modify the settlements involved.
- Many individual respondents and some Parish Councils favoured the removal of existing Community Clusters because they considered that recent development has been too rapid and 'intensive' and had resulted in an inappropriate pattern of development which did not meet local needs.
- Many agents, landowners / developers expressed a preference for a more robust and objective criteria-based methodology for defining Community Clusters, for example based on functional service areas. Some respondents felt that this would allow consideration to be given to whether settlements might become more sustainable with the right amount of additional development.
- By contrast, the majority of individuals and Parish Councils were clear that the decision about Community Cluster status should continue to be determined solely by the community and the Parish Councils who represent them, since they have the best understanding of local needs.
- Some agents, landowners / developers noted that some settlements within existing Community Clusters were likely to become Community Hubs if a criteria-based methodology was applied. They also suggested that it should be possible to form Community Clusters across settlements from more than one Parish.

Question 14 sought opinion on whether any additional Community Clusters should be identified.

Only 112 of the 412 respondents addressed this question. Whilst a small majority (55%) did not think that any additional Community Clusters were required, a significant minority of responses (45%) considered additional clusters appropriate. Comments included:

- A range of respondents including Parish Councils as well as those promoting land, identified a large number of additional settlements which could act as Community Clusters across Shropshire.
- A number of respondents noted that many small communities already function together as a sustainable community and should be given the opportunity to provide more housing to help sustain existing facilities. Others felt that such sustainable communities should not be allowed to evade making a proportionate contribution to meeting growth needs.
- Many respondents repeated the comments made in response to Question 13, in particular the need for a clear methodology to identify Community Clusters and that decisions about Community Cluster status should continue to be determined solely by the community and the Parish Councils who represent them.
- Some respondents were concerned that further development should be better co-ordinated with infrastructure investment. It should also be possible for a Parish Council to nominate all of its settlements, perhaps without boundaries, and then to limit development to a very small number of houses per settlement up to a total limit for the parish.
- Consideration should be given to the possibility of a new settlement providing some of the services and facilities that the existing settlements in eastern Shropshire cannot sustain.

Criteria for the Community Hub Policy

Question 15 requested views on proposed criteria which may be included within the Community Hub policy. It allowed respondents to provide an indication of the level of importance they attached to each criterion, using the following ranking scale: (1) Unimportant; (2) Neutral; (3) Important; or (4) Very Important.

Of the 412 unique responses received, the number of respondents that rated each criterion using the above scale varied from a maximum of 253 to a minimum of 216. The specific number of respondents on each criterion and the proportion that selected each ranking scale is summarised within the table below:

Community Hub Draft Criteria	Responses¹	1	2	3	4
1. Development proposals must have regard to relevant policies on Sustainable Design and Development Principles.	247	1.21%	6.07%	36.03%	56.68%
2. Development should be of a scale and design that is sympathetic to the character of the settlement and its environs.	252	0.00%	1.59%	31.35%	67.06%
3. Development should be well and clearly related to the existing built form of a settlement and not result in an isolated form of development.	251	0.80%	17.93%	20.72%	60.56%
4. Development should reflect design criteria and policies identified within relevant Neighbourhood Plans and Community Led Plans.	250	4.80%	6.00%	27.60%	61.60%

Community Hub Draft Criteria	Responses¹	1	2	3	4
5a. Development proposals to extend a Community Hub beyond its natural built form will normally consist of a small group of dwellings and include a range of housing sizes, types and tenures.	235	1.70%	23.83%	20.85%	53.62%
5b. Development proposals should protect the integrity of any strategically important gaps between settlements.	250	1.60%	17.60%	18.80%	62.00%
6. There should be sufficient infrastructure capacity, or scope to address or alleviate any infrastructure constraints to appropriately meet development needs.	250	0.40%	6.80%	30.00%	62.80%
7. Sites of five or more dwellings should include an appropriate mix* of types and sizes of housing; and meet local needs for affordable and family housing based on any local evidence	247	4.86%	20.24%	17.41%	57.49%
8. Non-residential sites should be designed to complement their setting and meet the needs of their intended occupiers.	251	0.80%	4.38%	41.43%	53.39%
9a. The cumulative impact of residential development proposals is a significant policy consideration. Cumulatively, residential development proposals** must complement the nature, character and size of a settlement.	247	1.62%	4.86%	30.36%	63.16%
9b. Decisions on cumulative impact will have regard to the cumulative increase to the size of the settlement.	243	1.65%	4.53%	33.74%	60.08%
9c. Decisions on cumulative impact will have regard to the number of other development proposals in close proximity or adjacent to the proposal site, in seeking to avoid the over-development of settlements	247	4.45%	19.03%	16.60%	59.92%
9d. Decisions on cumulative impact will have regard to the benefits arising from the development.	240	6.25%	6.67%	32.08%	55.00%
10. The cumulative impact of non- residential development is also a significant policy consideration. Cumulatively, non-residential development* must complement the nature, character and size of a settlement.	246	1.63%	23.17%	19.51%	55.69%
11. Allocations made within Community Hub settlements in the SAMDev Plan are considered appropriate sites for development.	216	2.78%	7.41%	42.13%	47.69%
12. Development within the Green Belt is generally considered inappropriate, apart from the specific exceptions referenced within national policy.	229	0.87%	24.45%	8.73%	65.94%
13. Development should respect the qualities of the local landscape and be sympathetic to its character and visual quality.	253	0.00%	0.79%	30.04%	69.17%
14. Development should have a positive effect on any relevant heritage designations.	251	1.20%	17.13%	19.12%	62.55%
15. Development should have a positive effect on any relevant environmental designations.	249	0.40%	20.48%	14.46%	64.66%

¹ Responses using the scale rating from 1-4.

* When determining an appropriate mix of types, sizes, and tenures, regard should be given to the need to provide appropriate family accommodation, available local evidence, and the outcomes of community consultation.

** In combination with any existing commitments, allocations or completions since the 31 March 2016.

Having analysed the consultation responses received, it is apparent that the majority of respondents consider that all the draft criteria proposed for Community Hubs were of value and should be reflected within any future criteria based policy for Community Hubs, with approximately 75% of respondents ranking each criterion as either important or very important and more than 53% of respondents ranking each criterion as very important.

Question 16 provided an opportunity for respondents to identify whether they considered there were any additional criteria which would be beneficial for Community Hubs. The majority of respondents indicated that they did not consider any additional criteria were necessary by either leaving the question blank or specifying as much within their response.

Of those respondents who did feel that additional criteria were necessary (around 70 commented), key suggestions included:

- Many individuals and Parish Councils requested a development boundary and settlement housing guideline.
- Many individuals, organisations and Parish Councils suggested that criteria should be identified requiring development to meet local housing need, with particular reference made to the need for affordable housing; family housing; and accommodation for the elderly.
- Many individuals and Parish Councils suggested criteria specify that local community views should be considered within the decision making process.
- Several individuals suggested the need for criteria to ensure that all necessary supporting infrastructure including utilities and roads are provided. It was also suggested that new development should contribute to the delivery/enhancement of wider community infrastructure, including: broadband; mobile phone reception; social infrastructure; and road infrastructure.
- A criterion should be included to promote brownfield sites. This view was expressed by several individuals and Parish Councils.
- Several representatives specified that criteria should require development to be well located, accessible and proportional to the settlement.

A relatively small number of respondents (around 45) also used Question 16 as an opportunity to make specific comments about the criteria outlined within Question 15. The main views expressed were:

- Many Parish Councils and individuals specified Criterion 4 should be amended to make specific reference to Parish Plans and Village Design Statements.
- A number of landowners/developers (many of which were represented by planning agents) specified that within Criterion 5a:
 - The term 'small group of dwellings' needs to be defined.
 - The term 'natural built form' could undermine the sustainable growth of settlements.
 - Support should be provided for development on the edge of settlements, to allow them to grow organically.
- A number of landowners/developers (many of which were represented by planning agents) specified that within Criterion 9, the term cumulative impact must be carefully defined to ensure that it does not restrict positive growth within a settlement.

- Conversely many individuals suggested that when considering the cumulative impact of development, a more extensive period than that specified (since March 2016) should be considered, with many suggesting March 2006, to recognise the significant development that has occurred over this period.
- A number of representations were received regarding Strategically Important Gaps in Criterion 5b, with some suggesting that they should be identified on the proposals map and other suggesting that greater weight should be applied to their protection.

Criteria for the Community Clusters Policy

Question 17 requested views on proposed criteria which may be included within the Community Cluster policy. It allowed respondents to provide an indication of the level of importance they attached to each criterion, using the following ranking scale: (1) Unimportant; (2) Neutral; (3) Important; or (4) Very Important.

Of the 412 unique responses received, the number of respondents that rated each criterion using the above scale varied from a maximum of 249 to a minimum of 214. The specific number of respondents on each criterion and the proportion that selected each ranking scale is summarised within the table below:

Community Cluster Draft Criteria	Responses¹	1	2	3	4
1. Development proposals must have regard to relevant policies on Sustainable Design and Development Principles.	244	0.82%	8.20%	36.48%	54.51%
2. Development should be of a scale and design that is sympathetic to the character of the settlement and its environs.	248	0.40%	2.02%	33.47%	64.11%
3. Development should be well and clearly related to the existing built form of a settlement and not result in an isolated form of development.	247	1.21%	16.19%	19.43%	63.16%
4. Development should reflect design criteria and policies identified within relevant Neighbourhood Plans and Community Led Plans.	247	4.86%	5.26%	28.34%	61.54%
5. There should be sufficient infrastructure capacity, or scope to address or alleviate any infrastructure constraints to appropriately meet development needs.	246	0.81%	4.47%	32.52%	62.20%
6a. Development should either be located on small scale infill sites or represent conversions of existing buildings within or adjoining the settlement. Infill sites will consist of land usually with built development on adjacent land on three sides.	246	7.72%	19.92%	16.26%	56.10%
6b. The rural area between Community Clusters is considered countryside. The integrity of any strategically important gaps between settlements will be protected.	249	3.21%	19.28%	12.45%	65.06%
7. When considering the size, type and tenure of housing, all residential development should have regard to the need to provide appropriate family accommodation; available local evidence; and the outcomes of community consultation.	245	1.63%	20.82%	17.14%	60.41%
8. Non-residential sites should be designed to complement their setting and meet the needs of their intended occupiers.	245	0.41%	3.67%	41.22%	54.69%

Community Cluster Draft Criteria	Responses ¹	1	2	3	4
9a. The cumulative impact of residential development proposals is a significant policy consideration. Cumulatively, residential development proposals* must complement the nature, character and size of a settlement.	247	0.81%	21.05%	14.98%	63.16%
9b. Decisions on cumulative impact will have regard to the cumulative increase to the size of the settlement.	241	2.07%	20.75%	18.26%	58.92%
9c. Decisions on cumulative impact will have regard to the number of other development proposals in close proximity or adjacent to the proposal site, in seeking to avoid the over-development of settlements.	244	3.69%	22.13%	13.11%	61.07%
9d. Decisions on cumulative impact will have regard to the benefits arising from the development.	236	4.24%	6.78%	34.32%	54.66%
10. The cumulative impact of non- residential development is also a significant policy consideration. Cumulatively, non- residential development* must complement the nature, character and size of a settlement.	243	0.41%	24.28%	18.93%	56.38%
11. Allocations made within a Community Cluster settlement in the SAMDev Plan are considered appropriate sites for development.	214	2.80%	10.28%	37.38%	49.53%
12. Development within the Green Belt is generally considered inappropriate, apart from the specific exceptions referenced within national policy.	227	0.88%	24.23%	10.13%	64.76%
13. Development should respect the qualities of the local landscape and be sympathetic to its character and visual quality.	249	0.00%	14.46%	18.88%	66.67%
14. Development should have a positive effect on any relevant heritage designations.	246	1.22%	17.07%	21.14%	60.57%
15. Development should have a positive effect on any relevant environmental designations.	245	0.82%	20.82%	16.33%	62.04%

¹ Responses using the scale rating from 1-4.

* In combination with any existing commitments, allocations or completions since the 31 March 2016.

Having analysed the consultation responses received, it is apparent that the majority of respondents consider that all the draft criteria proposed for Community Clusters were of value and should be reflected within any future criteria based policy for Community Clusters, with more than 70% of respondents ranking each criterion as either important or very important and more than 54% of respondents ranking each criterion as very important.

Question 18 provided an opportunity for respondents to identify whether they considered there was any additional criteria which would be beneficial for Community Clusters. The majority of respondents indicated that they did not consider any additional criteria were necessary by either leaving the question blank or specifying as much within their response.

Of those respondents who did feel that additional criteria were necessary (around 60 commented), key suggestions included:

- Many individuals and Parish Councils recommended criteria specify that local community views should be considered within the decision making process.

- Many individuals and Parish Councils requested a development boundary and settlement housing guideline.
- Many individuals, organisations and Parish Councils suggested that criteria should be identified requiring development to meet local housing need, with particular reference made to the need for affordable housing; family housing; and accommodation for the elderly.
- Several individuals suggested the need for criteria to ensure that all necessary supporting infrastructure including utilities and roads are provided. It was also suggested that new development should contribute to the delivery/enhancement of wider community infrastructure, including: broadband; mobile phone reception; social infrastructure; and road infrastructure.
- A criterion should be included to promote brownfield sites. This view was expressed by several individuals and Parish Councils.
- A number of individuals and Parish Councils specified that they disliked the concept of Community Clusters.
- A number of Parish Councils suggested that there is a need for criteria to protect the open countryside, particularly between settlements within a Community Cluster.
- Several representatives specified that development criteria should require development to be well located, accessible and proportional to the settlement.

A small number of respondents (around 50) also used Question 18 as an opportunity to make specific comments about the criteria outlined within Question 17. The main views expressed were:

- Many Parish Councils and individuals specified that Criterion 4 should be amended to make specific reference to Parish Plans and Village Design Statements.
- A number of landowners/developers (many of which were represented by planning agents) specified that within Criterion 6a the definition of 'small scale infill sites' is tightly defined and could limit development and have a negative impact on the policy.
- A number of representations were received regarding Strategically Important Gaps in Criterion 6b, with some suggesting that they should be identified on the proposals map and other suggesting that greater weight should be applied to their protection.
- A number of individuals specified that when considering the cumulative impact of development in Criterion 9a, a more extensive period than that specified (since March 2016) should be considered, with many suggesting March 2006, to recognise the significant development that has occurred over this period.
- Counter to this view, several landowners/developers (many of which were represented by planning agents) suggested that the issue of cumulative impact must be carefully considered to ensure that it does not restrict the positive growth of a settlement.

Criteria Based Policies, Development Boundaries, Development Guidelines and Allocations

Question 19 sought views on whether criteria based policies for Community Hubs and Community Clusters would strike an appropriate balance between providing

certainty on the types and levels of development whilst also maintaining choice and competition. Of the 412 respondents, 198 addressed this issue with 70% indicating that they felt the criteria based policies would strike an appropriate balance, whilst 30% indicated that they did not feel the criteria based policies would strike an appropriate balance.

The main views expressed about whether criteria based policies for Community Hubs and Community Clusters would strike an appropriate balance between providing certainty on the types and levels of development whilst also maintaining choice and competition were:

- A number of landowners / developers (many of which were represented by planning agents) and several organisations specified that the balance between providing certainty and choice and competition is critical.
- Some landowners / developers (many of which were represented by planning agents) indicated that the criteria based policies were too restrictive and would reduce competition and delivery.
- Conversely many individuals and Parish Councils specified that the criteria were too subjective and would result in too much uncertainty. Consequently there is a need to more tightly define the criteria.
- Similarly, many individuals; Parish Councils; organisations; and landowners / developers (many of which were represented by planning agents) specified that whilst the criteria based policies are valuable, settlement boundaries; guidelines; and allocations provide greater certainty.
- Several individuals and Parish Councils highlighted the importance of ensuring a consistent interpretation of the criteria within the policies.
- Many individuals and Parish Councils specified that the criteria needed to provide greater recognition of the role of Parish Plans and Village Design Statements (along with community opinion), in the decision making process.
- Many individuals and Parish Councils also suggested that the levels of development permitted within a Community Hub must be based on housing need and a settlements capacity to grow sustainably.
- A number of landowners / developers (many of which were represented by planning agents) suggested that the definition of infill development should be revised with some suggesting it was too prescriptive.
- A number of landowners / developers were supportive of the criteria based policy approach as it removed the need for a subjective assessment of sites for allocation.

Question 20 sought opinion on whether a consistent approach of identifying no development boundaries within Community Hub and Community Cluster settlements is appropriate.

233 of the 412 respondents addressed this question. The results were an almost exactly even split for and against, with strong views expressed on both sides.

Comments included:

- Many respondents considered that development boundaries are crucial to provide clarity, certainty and consistency for both local people and developers about where development is and is not allowed. Development boundaries help to maintain the character of rural settlements by controlling speculative and

unplanned development and by preventing neighbouring settlements from merging.

- Some respondents observed that the confidence of many rural communities has already been undermined by the scale and distribution of recent development in rural settlements in Shropshire and that removing development boundaries and relying on planners and developers interpreting complex policies on a case by case basis would make this worse. Development boundaries are practically the only mechanism which is universally understood by local residents. It was suggested that local communities and Parish Councils could help to re-assess existing development boundaries to assist Shropshire Council with resource pressures.
- Other respondents consider that the removal of development boundaries would bring greater certainty and delivery since they can often be inappropriately restrictive, ruling out sensible proposals just because they fall just the wrong side. Development boundaries are considered to be inappropriate where the settlement pattern varies so greatly. The existing boundaries were often established many years ago and proposals should therefore be considered on their merits even if outside these outdated boundaries.
- Some respondents consider that basing the housing requirement for a settlement on the allocation of a single site or a limited number of sites restricts growth and contributes to the undersupply of housing in rural areas. It is suggested that there should be a 'use it or lose it' approach to avoid undeliverable sites preventing other sites from coming forward.
- Some respondents observed that if development boundaries are removed, Community Hub and Community Cluster settlements should not have individual housing targets or thresholds that encourage developers to compete to secure planning permission before the threshold is exceeded. It is considered that, with an adequate policy to manage cumulative impact, a housing guideline is not necessary.

Residential Development in the wider Countryside

Question 21 sought opinion on what local criteria, if any, should be applied to residential development in the wider countryside, in addition to those produced at the national level.

It can be concluded from the responses received; that many respondents consider that the national policies proposed for the management of residential development within the open countryside are appropriate or have no view on this matter, as many either left this question blank or commented to this extent.

Of those respondents who did consider that additional criteria would be beneficial, the key themes are summarised below:

- Many respondents specified that the 'build your own' affordable housing; agricultural workers dwelling; and rural building conversion policies have been very effective and should be retained.
- Many respondents specified the need to meet the affordable housing needs of local communities should be included as a local criterion.
- Many respondents, particularly individuals and environmental organisations specified that policy should ensure that residential development should be of an appropriate size and scale to its setting and sufficient infrastructure should be

available to support it. Particular concern was expressed about access to utilities and appropriate roads.

- Conversely some respondents, particularly Parish Councils and individuals specified that no residential development should occur within the countryside or that it should only / first occur on brownfield sites.
- Many individuals; Parish Councils; and other organisations specified the need to reflect local opinion within the decision making process, both through consultation and reference to Community Led Plans.
- Many Parish Councils and individuals specified that existing local policies are working effectively and this approach should be retained.
- A common view expressed by individuals and Parish Councils was the need to provide development boundaries for smaller settlements.
- Many respondents, including individuals; organisations; and Parish Councils specified that protection of designated and non-designated environmental and heritage assets represents an important local consideration.

Non-Residential Development in the wider Countryside

Question 22 sought to identify opinions on what local criteria, if any, should be applied to non-residential development in the wider countryside, to support those produced at the national level.

It can be concluded from the responses received; that many consider that the national policies proposed for the management of non-residential development within the open countryside are appropriate or have no view on this matter, as many either left this question blank or commented to this extent.

Of those respondents who did consider that additional criteria would be beneficial, the key themes are summarised below:

- Many respondents, particularly individuals and landowners (many of which were represented by planning agents) specified that policies should provide sufficient flexibility to allow rural businesses to grow and diversify.
- Many individuals; Parish Councils; and other organisations specified the need to reflect local opinion within the decision making process, both through consultation and reference to Community Led Plans.
- Many respondents, particularly individuals and Parish Councils specified that non-residential development should be of an appropriate size and scale to its setting and sufficient infrastructure should be available to support it. Particular concern was expressed about access to appropriate road and broadband infrastructure.
- Conversely, some individuals specified that development in the countryside should be avoided.
- Individuals and Parish Councils specified that there is a need to prioritise or only develop brownfield sites in the countryside.
- Individuals and Parish Councils specified that existing local policies are working effectively and this approach should be retained.