



Shropshire Local Plan Review
Consultation on Issues and Strategic Options

Response from the
Campaign to Protect Rural England
(Shropshire Branch)

March 2017

Introduction

Q1 and 2: Respondent information

- 1.1. CPRE Shropshire welcomes the opportunity to respond to the Options Stage of the Shropshire Council Local Plan.
- 1.2. We believe this is an important opportunity to shape the future of the County.
- 1.3. Contact details are given in the covering e-mail submitted with this document.
- 1.4. This document sets out our responses to the questions asked in the Council's consultation questionnaire. We reproduce each question before setting out our response to it. First, however, we set out our more general concerns about the consultation process.
- 1.5. Before answering the main formal questions, we have four specific concerns about:
 - A. Out of date and incomplete information
 - B. The lack of options relating to types of housing
 - C. The Sustainability Appraisal
 - D. The inter-relationship of Options
- 1.6. We also believe it is important to consider assumptions made about:
 - E. The future economy of the County.

A. Out of date and incomplete information

- 1.7. The first problem is that the most recent Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) were both produced in 2014 for the SAMDev process. They are, therefore, to some degree, out of date and also prepared for a time period up to 2026.
- 1.8. A new SLAA will be produced following the current call for sites, and a SHMA is expected in due course though not in time for this consultation. Both are part of what is required to develop a plan according to Para 158 of the NPPF.
- 1.9. Para 014 of the NPPG Local Plan section explains a Local Authority's duties in this respect. It says:

'The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively'

'Local planning authorities should publish documents that form part of the evidence base as they are completed, rather than waiting until options are published or a Local Plan is published for representations. This will help local communities and other interests consider the issues and engage with the authority at an early stage in developing the Local Plan.'

- 1.10. In July 2016 a report was produced which sought to establish the Full Objectively Assessed Housing Need (FOAHN) for Shropshire. However, this only dealt with the quantum of development not, and critically, the type of housing development actually needed.
- 1.11. The FOAHN document is currently the only document included as background evidence to the Options Consultation and we comment below on its weaknesses.
- 1.12. But this means what is also lacking is any explanation beyond the Options Consultation Document which justifies the choice of options, or the exclusion of others. In particular, there is no explanation as to:
 - a. The reasoning behind the choice of those quanta of housing
 - b. The impact that might have on other policy areas
 - c. The impact that might have on the type of housing provided
 - d. The realism of the economic growth projections
 - e. The justification for claims relating to the HS2 and other external factors.
- 1.13. Without that analysis by the Local Authority it is inevitably harder for external bodies to critically assess the options presented.

B. Type of Housing

- 1.14. CPRE understands that this is a partial review. However we are concerned that it does not include options for the type of housing to be provided or how affordable housing will be prioritised.
- 1.15. The SHMA for SAMDev demonstrated the need for particular types of housing and most obviously to accommodate the aging population in the County, which is likely to continue whatever policies are pursued, not just because of the current retired population in the County but because of the bulge of 45-65 year olds in the demographic profile and the attractiveness of the County to retiring in-migrants.
- 1.16. It is an issue we specifically raised with the Council when we met officers in July 2016. The NPPG in relation to Housing Needs Assessment (Paragraph: 021 Reference ID: 2a-021-20160401) is clear on this point.

'Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Local authorities should therefore identify particular types of general housing as part of their assessment.'

- 1.17. More recently the Government has recognised the importance of this issue in the Housing White Paper by suggesting it will produce more specific guidance. Para 4.42 of the HWP says:

'To ensure that there is more consistent delivery of accessible housing, the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the secretary of State to produce guidance

for local planning authorities on how their local development documents should meet the housing needs of older and disabled people.'

- 1.18. While this guidance is not yet available we would like Shropshire Council to take the lead in seeking to develop policies in this review that will ensure housing is provided which is appropriate to older people. This will also help free up larger homes for the rest of the market. At the same time it could help to ensure the emerging plan remains consistent and up to date with policy in this area.

C. Sustainability Appraisal

- 1.19. The consultation is accompanied by a Sustainability Appraisal, based on a Scoping Exercise in Dec 2016. Not surprisingly the Sustainability Appraisal is fairly broad in its comments given the lack of detail on development proposals at the Options Stage. However, it seems to us flawed in how it addresses the baseline data.

- 1.20. While useful information is supplied in the Scoping Study, the Appraisal seems to assume that the baseline is (by default) an extrapolation of current policies. NPPG (016 Reference ID: 11-016-20140306) says that:

'The term 'baseline information' refers to the existing environmental, economic and social characteristics of the area likely to be affected by the Local Plan and their likely evolution without implementation of new policies.'

- 1.21. The interpretation in the SA leads, for example, to the conclusion that Option 2 for Housing has no adverse effects in many categories because it continues the current housing trajectory. This does not seem to allow the Sustainability Appraisal to consider the cumulative impacts of such an approach (as is required by Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004) or whether environmental limits would be breached as would be required if the Plan is to achieve: *'the objective of contributing to the achievement of sustainable development'* (NPPG: 001 Reference ID: 11-001-20140306.)

- 1.22. It is almost inevitable when considering Urban Extensions, for example, that the first ones given planning permission will be on less sensitive locations. So a continuation of Urban Extensions at the same location will be likely to increase the environmental impact in a non-linear way and have cumulative impacts alongside the other extensions.

- 1.23. It is also difficult to consider the Options for Distribution discretely to the overall numbers, not least because some areas of the County are more environmentally sensitive than others.

- 1.24. A further problem is the way mitigation is treated in the SA. Lack of development, for example, is seen as prohibiting investment in Public Transport. However, during recent years of significant development there have been many cut backs in public transport and experience suggests that however much Public Transport investment is put in place it will not compensate for the choice of a less sustainable, more car dependent location.

- 1.25. Lastly the SA only considers the options set out in the document. It seems reasonable to us that an option equivalent to the Council's FOAHN, and a figure significantly below it, should both also have been included.
- 1.26. For all these reasons we are not convinced the SA, as it stands, provides a sound enough rationale for the comparison of all reasonable options.

D. Inter-relationship of Options

- 1.27. The consultation sets out three options each for housing, distribution of housing and for economic development as well as options relating to rural hubs.
- 1.28. One obvious difficulty with this approach is that there does not seem to be a clear relationship between the options for housing, distribution or economic development.
- 1.29. This makes it hard to cross-relate the impact of each option. In particular the higher the levels of housing and economic development the more sensitive are likely to be the locations for development and this may affect the optimum distribution.

E. Economic Background

- 1.30. Para 154 of the NPPF says '*Local Plans should be aspirational but realistic*'. Local Authorities have been warned in the past against the use of predictions in LEP Bidding Documents, for example. The Options paper cites three key elements which it sees as supporting a bullish approach to future economic growth.
 - i. The West Midlands Combined Authority (and Midlands Engine)
 - ii. The Northern Powerhouse
 - iii. The Northern Gateway.
- 1.31. The paper does not seem to offer any specific clear reason why these should benefit Shropshire apart from their relative proximity, which may also mean they compete against Shropshire, especially if significant amounts of land and housing are released nearby.

i. The West Midlands Combined Authority (WMCA)

- 1.32. The WMCA is based around the West Midlands Conurbation. Telford and Wrekin are associate members but not Shropshire. In terms of the promotion of economic development their aim appears to be concentrated mainly on the conurbation and surrounding districts. A significant amount of their effort is based around the new HS2 Stations in Solihull and Birmingham and how to link those to other parts of the conurbation. It is true that they have identified development opportunities in areas closer to Shropshire but we see no reason to believe these are being prioritised.

- 1.33. The Midlands Engine and Midlands Connect (whose final report was delivered in March 2017) further dilute any possible benefits because their main impact is to improve connectivity between the WM conurbation and the East Midlands.
- 1.34. If one examines specifically the HS2 Connectivity Package they are involved in, it includes a large number of schemes for development prior to HS2 which would enhance connectedness around the conurbation and in the East Midlands, but only one scheme benefiting Shropshire, (the electrification from Wolverhampton to Shrewsbury) to be considered after HS2 is in place.



Source: AECOM

- 1.35. The same scheme is identified in Midlands Connect for development work to commence between 2025 and 2030, with actual work in the longer term period of 2030 onwards.

ii. The Northern Powerhouse

- 1.36. It is hard to see how the Northern Powerhouse, which aims to enhance development across the North, would impact significantly on Shropshire.

iii. The Northern Gateway

- 1.37. The Northern Gateway is much closer and would create a major investment strategy around the new HS2 Crewe Station. It aims to provide 100,000 new jobs and 120,000 new homes around Crewe and North Staffordshire. It does not include Shropshire in its prospectus.
- 1.38. Immediately next to the HS2 station at Crewe the Cheshire East High Growth area includes nearly 340 hectares (Ha) of land.
- 1.39. The Northern Gateway Development Zone (NGDZ) prospectus also promotes a further 30 Ha at Winsford, 140 Ha in the Ceramics Valley Enterprise Zone, 34 Ha at Meaford, 152 Ha at Keele University, and 47 Ha at Blythe Valley.
- 1.40. While the HS2 station would have a 40 minute rail link to Shrewsbury it would also have similarly close links to Stoke, Stafford, Chester, Liverpool and Manchester. Within the Northern Gateway proposals improvements are supported on the A500 from Crewe to Stoke and a new rail connection from the HS2 Station to the Stoke/Derby route which would further cement the economic gain to competing districts around the HS2 hub rather than to Shropshire.
- 1.41. Given such a dramatic change it is hard to do more than speculate about how the Gateway might benefit a peripheral County such as Shropshire, but previous history, both nationally and internationally, would suggest that improvements to transport infrastructure largely benefit those areas very close by whilst other areas only gain significantly if there are additional infrastructure investments.
- 1.42. It is not surprising that Shropshire wishes to promote itself on the back of HS2, but with so much land likely to become available more closely linked to the station it would seem that the greatest way Shropshire is likely to benefit is from attracting specific higher value economic activity drawn in by the environment and quality of the area.
- 1.43. It would also suggest that a higher level of housing, rather than supporting the County's economy, could simply create increased commuting to new sites in Crewe and elsewhere in the Northern Gateway (as well as allowing people to retire from surrounding areas). For this reason alone the optimum distribution of housing in Shropshire (between the three options) may vary depending on how much housing is proposed.

Full Objectively Assessed Housing Need (FOAHN)

- 2.1. The FOAHN calculations demand close scrutiny because they should underpin the housing number Options offered by Shropshire Council and we comment on them in detail below. But for the sake of clarity the remaining paragraph numbering in this document reflects the Question we are commenting on.

Q3. Do you consider the housing need identified in Shropshire between 2016 and 2036 within the Full Objectively Assessed Housing Need (FOAHN) is appropriate and in line with national guidance?

- 3.1. The simple answer to Question 3 is no.
- 3.2. The FOAHN was produced in July 2016.
- 3.3. As we understand it the final FOAHN has been achieved by using a POPgroup methodology based on assumptions about ten year migration rates, then applying 2012 Household Representative Rates (HRR) with vacancies continuing to run at 4.4%.
- 3.4. A rise in the student population resulting from the expansion of Shrewsbury College, using a similar HRR, is then added in with an assumption that 20% will remain in Shrewsbury.
- 3.5. Finally an additional housing allowance is added for concealed housing, because of the higher percentage rise in concealed houses in Shropshire than elsewhere. This results in a total figure of 25,178 houses.
- 3.6. It is important to understand at the outset that this need does not result from natural change, which would actually lead to population decline. It is based on assumptions about in-migration (mainly from other parts of the UK) which will to some degree be consequential on the provision of new houses (in a circular way). So in reality such an increase in housing may simply increase Shropshire's role as a retirement destination and a commuter belt for other cities, especially if it amounts to over-provision of housing.
- 3.7. It is also of note that on the basis of both the Oxford Economics forecasts (which the Council commissioned) and the Council's own internal work, the FOAHN report suggests its total housing need (25,178) would not only meet the labour force needs of the County but also generate some leeway.
- 3.8. CPRE is not in a position to address the detailed modelling, but we have broad concerns about the cumulative effect of this approach, the uncertainty involved, and the risk of double counting.
- 3.9. Our analysis of the way the SNHP and FOAHN figures have been arrived at is as set out in Table 1 below (taken largely from the Tables on page 61):

Table 1: Shropshire Council FOAHN broken down by elements	
Reduction in households based on births less deaths 2016 - 2036 (-8,700/2.19)	-4,000
Assumed households arising from inward migration 2016 to 2036	14,300
Increase in households based on increases in 2012-based SNPP (22,600/2.19)	10,300
Increase in households assuming a reduction in HRR (312,800/2.19 - 312,800/2.31)	7,100
Total household increase from 2012-based SNHP	17,400
Ten year migration trend (excess over 2012-based SNHP) (22,500 - 17,400)	5,100
University Centre, Shrewsbury (160,000 - 158,900)	1,100
Increase in dwellings required because of 4.4% un-occupancy (24,700 - 23,600)	1,100
Concealed households	478
FOAHN figure	25,178

SNHP Figures

- 3.10. We agree that the starting point for any FOAHN has to be the latest SNHP figures which give the housing projection of 17,400, but that does not guarantee the SNHP figures are not too high.
- 3.11. 'Natural Change' alone (births minus deaths) would reduce the population by 8,700 from 2016 to 2036.
- 3.12. Yet, if one assumes a Household Representative Rate (HRR) of 2.19 is applied to the SNPP increase in population (22,600) the result is 10,300.
- 3.13. In other words, there is a built-in assumption that in-migration will produce another 14,300 households by 2036. It is questionable whether this scale of in-migration will in fact happen.
- 3.14. The remaining element of the overall SNHP increase of 17,400, (i.e. 7,100 additional households) comes from a reduction in the HRR figure from 2.31 to 2.19 over the twenty year plan period. In other words, over 40% of the 17,400 figure comes from the acceptance that, on average, 0.12 fewer people will be living in each dwelling at the end of the plan period than at the beginning.
- 3.15. CPRE has also previously questioned the assumption that household size will continue to decline in the long term. Nationally there has been a general levelling off of household size and, while this may relate partly to the recession, many of the causes, such as house price affordability, are unlikely to improve and so we may already have reached the limits of average Household Size Reduction.
- 3.16. This is important because, as is demonstrated by these figures, even small changes in Household Size can dramatically change the FOAHN. The Government figures for HRR have been criticised by, amongst others, Oxford Economics (used by

Shropshire Council in forecasting some of the figures within the FOAHN). Government forecasts of housing growth have persistently overshoot by a long way and one of the reasons is that they have over-estimated the reduction in the HRR figure.

- 3.17. Rather than relying on 2012 HRR figures or assuming some gradual return to earlier (2008) HRR rates we think Shropshire Council should have tested HRR rates from their own in-house records of Shropshire's population size and its numbers of dwellings. Such empirical evidence should be robust enough to satisfy policy requirements.

From SNHP to FOAHN

- 3.18. But even this SNHP figure has been eclipsed in the FOAHN report. Shropshire's FOAHN is actually 45% higher than the SNHP figure. Even accounting for higher SNPP figures in 2014, this is still a very large increase and raises questions about its robustness.
- 3.19. The first reason is that, even though SNHP itself takes account of five year migration figures, the Council prefers to rely on POPgroup results. The 5 year migration trends add 2,900 to the SNHP total and the 10 year trends increase this by a further 2,200.
- 3.20. PAS advice is to consider 10, or even 15 year migration figures to test the SNHP, but this does not imply that future migration rates will reflect previous migration rates. It is certainly unclear from the FOAHN report what the justification is for that assumption. And nowhere is it clearly set out how this increase of 5,100 has actually been calculated.
- 3.21. There is then assumed to be a further increase in the population based on increased student numbers, and on the assumption of a similar HRR rate to other members of the population. However, there is no reason to believe that students, even those living in private housing, will replicate their peers. In fact they are much more likely to live in shared accommodation and less likely to have children, so that while they are students their requirement for housing is likely to be both lower and significantly different.
- 3.22. Additionally 20% are assumed to stay on after graduation. It is unclear how this assumption is arrived at (presumably based on past retention rates which may not apply with a larger student population) or why the 20% who stay on will not simply displace other people who would otherwise enter the job market in Shropshire, especially given that the FOAHN report suggests the housing total is more than adequate to meet economic needs. In other words this item may well involve some double-counting.
- 3.23. The figure of 1,100 dwellings required because of the University Centre is therefore likely to be overstated and, even if it is included should specifically be allocated to Shrewsbury, as we explain when we consider distribution.
- 3.24. The number of houses needed is then further bolstered by an assumed vacancy rate of 4.4%. A figure of below 3% would seem much more desirable in policy terms. While the FOAHN cannot take a view on policy it should consider the extent

to which the Council is likely to achieve a reduction in vacancies. It is not clear to us from the FOAHN how this has been done.

3.25. Furthermore, the logic of adding to the housing requirement because of vacancies is suspect. The FOAHN 2016 figures show that there were 6,300 vacant properties (142,700 - 136,400). The expectation is that there will be 7,400 vacant properties by 2036. Surely, if there really were that many vacant properties in 2016, the effort should be to fill them with households, not to allow the number of empty properties to increase.

3.26. Lastly, the FOAHN report considers whether there are Market Signals which might suggest that an uplift in housing is needed.

3.27. NPPF (Para 17) requires Councils to make adjustments if there are Market Signals such as land prices and affordability. The NPPG gives a longer list of measures which *may* indicate a need for a housing adjustment, although it leaves a great deal of discretion. It says:

'Longer term increase in the number of such households may be a signal to consider increasing planned housing numbers. The number of households accepted as homeless and in temporary accommodation is published in the quarterly Statutory Homelessness release.' (019 Reference ID: 2a-019-20140306)

3.28. Tables 11 - 13 of the FOAHN report set out the results for each of the relevant signals. Only one, for Concealed Households, has raised any concerns.

3.29. Table 13 considers Over Occupation, Homelessness and Temporary Accommodation from 2001-2011 and compares the situation to similar Local Authorities, showing that the position of Shropshire is relatively good.

3.30. In terms of Concealed Households specifically, Shropshire's overall level is very low, at 1.3% (the best comparator being 1.1%) well below the National Trend (1.8%). The percentage change is considered high at 67.7% but this is starting from a low base and the 2011 Census results are during the recession.

3.31. The FOAHN itself is cautious about extrapolating this trend. It says: *'It should be noted that the infrequency of available data makes it difficult to identify when the most significant rise occurred or what has changed since the last 2011 census. In other words there is no evidence that this trend has continued over the last five years.'*

3.32. The PAS advice in their Objectively Assessed Need and Housing Targets Technical advice note, Second Edition, July 2015 (which is quoted elsewhere to justify the FOAHN approach), is also cautious about the use of concealed households as a market signal, arguing that those are households which would be created anyway.

3.33. Para 7.17 says: *'But it does not make sense to add concealed families, homeless households and those in temporary accommodation to the demographically projected OAN, as some studies do. The projections already include those new households which, on the basis of past trends, may be expected to come into being through concealed families getting their own homes, or through homeless*

people moving from temporary institutional accommodation or from the street into conventional homes. To add these new households again would be double-counting.'

- 3.34. It certainly seems odd that a single signal is being used in this way when all the other market signals suggest there is no need for an uplift and when the housing numbers have already been increased to a level very significantly above the SNHP.
- 3.35. The subsequent adjustment made to the FOAHN for 2016 of 458 houses (which is the exact difference between concealed households in the 2001 and 2011 census) does not seem to us justified.
- 3.36. In our view an appropriate level for the FOAHN would be much closer to, or below, the 17,400 predicted in the SNHP and the additions made by Shropshire Council seem excessive, and in the case of Students and Concealed Households probably involve some double counting.

Housing Options

Q4. Which housing requirement option would you prefer to see used for the Local Plan Review and why? Please indicate if there are any other options you think the Council should consider.

- 4.1. CPRE considers that an Option which is much closer to the SNHP predictions should be considered. As stated above we consider that several of the assumptions which support that FOAHN are themselves open to question so to further add to that number is certainly not warranted.
- 4.2. We certainly do not see any economic justification for additional housing and that is not supported by the FOAHN report itself.
- 4.3. There is also no reason given in the Options Report as to why only Options above the FOAHN figure have been put forward.
- 4.4. Should additional housing be required it would be important that it is directed at specific groups and there is no evidence of that. In particular, the need to ensure there is adequate affordable housing and housing to meet the requirements of specific groups, particularly the increase in the population over 65 and even over 85, is not addressed and no measures suggested.
- 4.5. Indeed, the ability to provide affordable housing on the back of market housing has been further undermined by the restrictions on smaller developments now upheld in the courts (despite concerns by Shropshire Council among others).
- 4.6. Without such policies there is a real risk that additional housing will encourage increased commuting from Shropshire to surrounding areas.
- 4.7. We certainly do not see any evidence to support the view expressed about Options 2 and 3 that increasing the number of economically active people living in Shropshire will necessarily translate into economic growth in Shropshire, but we agree with the admission that it could also lead to an increase in non-economically active people.
- 4.8. All the options would require an increase in housing delivery above what has been achieved in the last three years and the largest would exceed the current Plan Targets, which CPRE has always considered to be too high.
- 4.9. The Options Paper does not consider the environmental, landscape or heritage detractors of Options 1 and 2, even though it is clear that the addition of significant new houses beyond 2026 will require additional land in the countryside or around historic towns. This seems to reflect the mistaken view in the SA that since they continue the current trend they will not have additional environmental impacts.
- 4.10. In regards to Option 3 the report says '*the overall sustainability will need to be balanced against the infrastructure and environmental constraints of towns and villages.*'

- 4.11. We believe this is misleading. The SA does not conclude that this option is sustainable in an 'overall' sense. It explains the impacts and benefits it sees resulting from Option 3. While it says some disbenefits (e.g. to soil) will depend on where development is located, it is more certain about others, such as impacts on heritage, countryside and whether the development is in sustainable locations. It does suggest mitigation for these, such as investment in heritage protection and public transport. However, those are far from certainties, even if they could outweigh the harm.
- 4.12. In our view this approach to SA clouds the issue that any Housing Option above the FOAHN needs to justify itself against the constraints of a historic rural County and the potential for cumulative change to the County as more commuters and retirees are attracted in.

Distribution of Development

Q5. Which strategic distribution option would you prefer to see used for the Local Plan Review and why? Please indicate if there are any other options you think the Council should consider.

5.1. We favour the Option B: Urban Focus approach, for several reasons.

- a) If Shropshire is not to have increasing levels of commuting to work then houses should be built near where the employment is. That in turn means that house building should be concentrated in the urban areas.

We fully endorse the submission of the Oswestry and District Civic Society, which argues that:

'development concentrated on urban centres tends to reduce motorised travel, whilst scattered development increases it. Thus, in terms of the NPPF, a strategy based on any significant amount of development in small settlements (those without a range of employment, shopping, cultural and education opportunities) cannot satisfy the third strand of sustainable development policy. It will not meet strategic objective i) set out in paragraph 1.12 of the consultation'.

Any strategy that encourages scattered development in country villages does not give enough emphasis to reducing Green House Gas emissions. It does not place enough emphasis on moving to a low carbon economy in the required drive to mitigate and adapt to climate change.

- b) An Urban Focus is also likely to make a fuller use of brownfield sites.
- c) A further reason for favouring Urban Focus relates to the maths of achieving the stated percentage splits under each of the three distribution options between Shrewsbury, the Market Towns and the Rural areas. The stated 'committed' figures given work out at 27%, 46% and 27% respectively for these three areas. In order to achieve the overall aspirations of 35% and 30% within Rural areas in the plan period under Options A and C, the 'required' percentages of allocation to Rural areas would, in our view, become unacceptably high.
- d) No evidence has been offered as to whether the existing policy of 'Rural rebalance' (with 26% of 'committed' development so far going into Rural areas) has helped any communities become more sustainable.
- e) The 1,100 extra houses deemed to be required because of the University Centre at Shrewsbury should be allocated wholly to Shrewsbury, rather than being spread on a percentage basis across the County as envisaged in all three of the Options offered.

- 5.2. Furthermore, for the reasons set out in c) above, we consider that Option A is the worst of the options offered, because it allocates too much housing to the Rural areas in the remaining period of the plan: the 'required' percentage allocation works out at about 45% of the total.

Economic Options

Q6. How might Shropshire best exploit these new investment opportunities to improve the economic performance of the County and what challenges might be encountered when seeking to achieve this?

- 6.1. As set out above, our view is that a prosperous future for Shropshire will probably rely on a targeted approach to higher productivity growth, which benefits from Shropshire's attractiveness, along with support for the rural and environmental industries which the area is best suited to attract. The provision of good quality broadband and smaller units, for example starter units, may be as important as large scale sites.

Q7. What other opportunities/challenges for economic growth might be encountered in the County over the period to 2036?

- 7.1. As set out above, HS2, linked to transport and industrial investment in competing areas, represents a significant challenge to Shropshire's economic wellbeing. If Shropshire is to benefit from those developments it needs to create its own particular offer, especially as there may be an excess of high quality sites coming on stream closer to HS2, rather than replicating what is available at better locations near the HS2 Northern Gateway station.

Q8. Which of the following Strategic Options would provide the most appropriate level of aspiration for the growth of the Shropshire economy?

Please set out the reasons for your choice and outline the opportunities and challenges for the Shropshire economy.

Or, set out an alternative Strategic Option outlining the key characteristics of this option for the growth of the Shropshire economy

- 8.1. In general terms we would support Option 3. While we accept that Shropshire will need to have sufficient readily available industrial sites to offer a choice to potential investors, a more targeted approach seems the most appropriate.
- 8.2. In regards to Option 1 it would require additional employment land with consequential environmental impacts. The Options Paper already acknowledges the aspirational nature of the 290 Ha in the current plan so it would be better to consider the release of further land only after a review of the plan.
- 8.3. Option 2 is in our view much riskier. While that option might be adopted as a way to justify additional housing, it is very unclear that Shropshire could support that amount of industrial development given the large amounts of land which will be available in adjoining counties. A failure to deliver the development, but too many houses, would inevitably increase the number of non-economically active people or

out-commuters. We also do not agree that simply by providing more land the County will create a more aspirational approach to economic development if it does not play to Shropshire's strengths.

- 8.4. The approach of Option 3 is, in our view, more appropriate to Shropshire and would encourage the development of newer and more innovative industries. Although a risk is identified in the SA that these kind of jobs might not materialise that is true of all approaches to economic development. Anyway, it seems equally (and perhaps more) true of Option 2 where the competition to success is clearer.
- 8.5. It is acknowledged in the report that Option 3 might lead to less land being required and a lower requirement. However, this would not necessarily mean the already aspirational allocations in the current local plan would be removed so there would be no shortage up to 2026. A review of allocations would almost certainly be desirable before 2026 in any case.
- 8.6. Of course, all industrial land options bear risks as it is hard to judge how technology and work practices will change over the next twenty years, but it appears to us that Option 3, with some flexibility for review, is likely to be the most forward looking approach.

Q9. Do you agree that these strategic objectives should continue to influence the economic strategy in the Local Plan for the period to 2036?

Please consider whether:

Any of these strategic objectives might be amended to better address the needs of the Shropshire economy;

Other strategic objectives might be identified in the Local Plan.

- 9.1. We do not have a comment on these Objectives. However, if Option 3 is pursued greater emphasis will need to be placed on those objectives which support innovative businesses coming forward and there may need to be some honing of these objectives.

Q10. Do each of these 19 sites make a positive contribution to the employment land supply in the County?

Might some, or all of these sites be used in other ways to make a more positive contribution to the Local Plan strategy over the period to 2036?

- 10.1. The 19 sites on 147 Ha are existing allocated sites that have not been developed and which are re-offered under Option 1. All the sites are greenfield and we would prefer to see brownfield sites offered. It is not stated what additional sites might be offered under Option 2.
- 10.2. The existing road serving the two sites outside Oswestry would benefit from being dualled before these sites are developed.

- 10.3. We are concerned that large-scale development at the two sites near Ludlow could threaten town centre businesses and we also note that there is still plenty of empty land at the adjacent Eco Park, so we are not convinced these sites should be included.
- 10.4. We are concerned that Church Stretton has an ancient and inadequate drainage infrastructure, and the Springbank Farm site could threaten the aquifers supplying bottled water in commercial quantities.
- 10.5. Craven Arms has a significant amount of flat agricultural/industrial land and the 3.5 Ha by the Business Park seems a logical extension to the town. However, we are concerned that the 2.5 Ha of land by the A49 trunk junction has very obvious access/egress problems onto the A49 at an already busy and potentially dangerous junction.
- 10.6. The Wem site is in reality open fields and seems to be an inappropriate choice, particularly as the railway already creates a natural boundary.

Q11. Does the protection provided to existing employment areas as a source of serviced and readily available land make a positive contribution to the supply of employment land and premises in Shropshire?

Please consider whether:

The level of protection provided to existing employment areas shown in the Authority Monitoring Report is appropriate.

The approach to protecting existing employment areas might be changed or improved in the partial review of the Local Plan.

- 11.1. We support the general protection of employment land, because otherwise it becomes attractive to other uses and additional land has to be released to replace it.
- 11.2. However, there may be occasions where employment land is not likely to be used and would be better developed in other ways.
- 11.3. Policy CS 14 is vague about the specific protection involved or what might constitute alternative uses (including not being developed at all). It would probably be helpful to have clearer guidance especially if the Council is contemplating a reduced allocation, as in Option 3 above.

Rural Options

Q12. Do you agree with the approach and/or the methodology proposed to identify Community Hubs?

- 12.1. Yes, on the whole. An objective approach, using a scoring system, is definitely a good idea. But Parish Councils should still be allowed to elect whether they then want to, or do not want to, become a Hub (or Key centre, small rural settlement, or whatever the terminology used is). We emphasise that it is important that Parish Councils have responsibility for this decision.
- 12.2. However, the scoring system needs to be refined. At present it fails to take into account the current threat of closure of many primary and secondary services. For instance, in Church Stretton one bank has recently closed, and the library and information centre are threatened with closure, as is the leisure centre and the school/community swimming pool.
- 12.3. Also, the individual 'weighted' scores (3 or 4) need to be changed. We do not see, for example how a secondary school, an NHS hospital and a supermarket (3 points) can score less than a community hall (4 points).
- 12.4. There is no mention of access to or efficiency of broadband (fast or otherwise) even though there are still many people, even Parish Councils, without an adequate broadband connection. As a result there will be a large number of people who do not have effective access to this whole consultation process.
- 12.5. There is also no mention of any deficit points e.g. lack of mains sewerage or mains gas supply, lack of pavements or street lighting etc.
- 12.6. Since the introduction of Hubs and Clusters some villages have had far more development imposed upon them than originally anticipated by them, as a result of the high housing target. We have not seen evidence that this has helped villages to remain sustainable. Villagers still have to get in their cars to go to work, to shop, and to go out for leisure.

Q13. Do you think any of the existing Community Clusters identified in Appendix 3 should no longer have Community Cluster status?

If so please specify any community support you are aware of for this proposal.

- 13.1. Appendix 3 is confusing in that all the Community Hubs identified in SAMDev (Schedule MD1.1) are listed in Appendix 3 as Community Clusters. The Cluster of Tyrley, Woodseaves (Sutton Lane), and Woodseaves (Sydnall Lane) as listed in SAMDev appears to have been omitted from Appendix 3.
- 13.2. It would have been helpful, and prevented confusion, if the consultation document had simply reproduced the above-mentioned schedule MD1.1 so that people could see what the current categorisation of Market Towns, Key Centres, Hubs and

Clusters is. It would have been even better if a map had been included, showing the locations of all these settlements, so that people could see what the distribution of them is, and whether development is being spread out or concentrated within the County.

Q14. Do you think any additional Community Clusters should be formed?

If so please specify any community support you are aware of for this proposal.

- 14.1. We have no indication that any further Community Clusters should be formed. Again though, the dichotomy between Hubs and Clusters is confused within the consultation document. The implication of the likely hierarchy listed at Appendix 2, paragraph 3.29 is that there will no longer be any category given the name 'Cluster'.

Q15. The table below provides a summary of some of the criteria which may be included within the Community Hub policy.

Please provide your opinion on the importance of each criteria, using the following ranking scale:

(1) Unimportant; (2) Neutral; (3) Important; or (4) Very Important.

- 15.1. We regard all criteria as being very important, with the caveats as set out in the answer to Q16

Q16. Please identify any additional criteria you consider would be beneficial for Community Hubs.

- 16.1. We note that most criteria for Hubs are then repeated word for word for Clusters. Criterion 7 for Hubs should have been split into two parts. At present the implication is that its second sentence applies only to developments of five or more houses. It should apply to all developments, as does Criterion 7 for Clusters.
- 16.2. Also, we do not see why the Criteria for Hubs should be limited to a small group of houses rather than also encouraging single plot developments. We agree that large developments should be discouraged in Hubs or in any other Rural settlements and that should be stated in policy, with a numerical value put on the number of houses in any one development.
- 16.3. All developments should meet local needs for affordable and family housing.
- 16.4. Every effort should be made to boost the County's stock of affordable homes.
- 16.5. Any document prepared with community support (such as Neighbourhood Plans (whether or not supported by a referendum), Parish Plans and Village Design Statements) should be accorded more weight than is often the case at present.

Q17. The table below provides a summary of some of the criteria which may be included within these policies.

Please provide your opinion on the importance of each criteria, using the following ranking scale:

(1) Unimportant; (2) Neutral; (3) Important; or (4) Very Important.

17.1. We regard all criteria as being very important.

Q18. Please identify any additional criteria you consider would be beneficial for Community Clusters.

18.1. None

Q19. Do you think that criteria based policies for Community Hubs and Community Clusters will strike an appropriate balance between providing certainty on the types and levels of development whilst also maintaining choice and competition?

19.1. We agree that a set of criteria based policies for Hubs/Clusters might give a degree of certainty over what development is and is not allowed. However, certainty is unlikely to be achieved, any more than it is now under the NPPF, and certainly not without development boundaries

Q20. Do you agree that a consistent approach of identifying no development boundaries within Community Hub and Community Cluster settlements is appropriate?

20.1. We strongly oppose the proposal to remove development boundaries in Rural areas. Those alone provide some certainty, for both local people and for developers, as to where development should be allowed and where it should not. The development boundaries are one of the chief aspects of the plan that people are entitled to be able to rely on.

20.2. It is a matter of regret that Shropshire Council do not always adhere to the plan in this respect, for want of certainty as to what is or is not 'sustainable' development. That fuzziness would only be exacerbated if all decisions had to be decided only on criteria based policies without the benefit of defined development boundaries.

20.3. Development boundaries act as restraints to random or speculative development in unsustainable rural areas. They are particularly important in areas that need special protection such as AONBs, prime agricultural land and SSSIs.

Development in Open Countryside

Q21. Residential: What local criteria, if any, do you consider should be applied in addition to those produced at the national level?

21.1. Policies incorporated into Neighbourhood Plans (whether or not supported by a referendum) should be adhered to.

Q22. Non-residential: What local criteria, if any, do you consider should be applied in addition to those produced at the national level?

22.1. Policies incorporated into Neighbourhood Plans (whether or not supported by a referendum) should be adhered to.