

Shropshire Council  
Shirehall  
Abbey Foregate  
Shrewsbury  
Shropshire SY2 6ND

Date: 15<sup>th</sup> June 2022

Dear Inspectors,

## **Shropshire Council Response to ID14: Legal Compliance – Statement of Community Involvement**

We write in response to the queries raised within correspondence ID14 regarding Legal Compliance – Statement of Community Involvement.

### **1. With regard to the status and role of the Statement of Community Involvement (2011 version, updated in 2014):**

When Shropshire Council commenced the Local Plan Review in late 2016/early 2017, it concluded that the adopted Statement of Community Involvement (2011 version, updated in 2014) (**EV008.03**) was up-to-date and appropriate to inform the scope and nature of engagement and consultation undertaken during the Local Plan Review process.

We would also note that the Local Development Scheme (LDS) was updated periodically during the Local Plan Review process. Appendix 1 of each of the iterations of the LDS addressed '*Document Profiles*'. In each 'Document Profile' for the Shropshire Local Plan Review, '*compliance with the published Statement of Community Involvement*' is referenced in the context of the 'involvement of stakeholders & the community' component of 'arrangements for production'. This reflects the continued position that **EV008.03** was appropriate to inform the scope and nature of engagement and consultation undertaken during the Local Plan Review process.

As such, throughout the Local Plan Review process, including all of the Regulation 18 'Plan Making' Consultations and the Regulation 19 'Pre-Submission' Consultation, it is **EV008.03** that has informed decisions on the scope and nature of engagement and consultation undertaken.

**EV008.03** was first adopted by Shropshire Council in 2011 following a period of public consultation. It was then reviewed in 2014, however due to the targeted nature of this review it was ultimately considered unnecessary to undertake further consultation at this time. Whilst it is acknowledged that **EV008.03** was not subject to a formal review process before the 2021 updated version (**EV008.02**), Shropshire Council remains of the opinion that **EV008.03** was appropriate to inform the scope and nature of engagement, including

all of the Regulation 18 'Plan Making' Consultations and the Regulation 19 'Pre-Submission' Consultation undertaken during the Local Plan Review process.

Shropshire Council also firmly believes that the engagement undertaken during the Local Plan Review process, including all of the Regulation 18 'Plan Making' Consultations and the Regulation 19 'Pre-Submission' Consultation, was in general conformity with the requirements of **EV008.03**. Indeed, this position is documented within Shropshire Council's response to Paragraph 5 of ID1 (within document **GC4**).

## **2. With regard to the status of the Statement of Community Involvement (2021 version) (EV008.02):**

As also documented within Shropshire Council's response to Paragraph 5 of ID1 in **GC4**, given the level of consistency between the approach to consultation within **EV008.03** and the then draft Statement of Community Involvement (subsequently adopted in June 2021 following a period of public consultation) (**EV008.02**), the community engagement process undertaken during the preparation of the draft Shropshire Local Plan was also considered to have been consistent with **EV008.02**.

However, for the avoidance of doubt, it was **EV008.03** that informed the scope and nature of engagement, including all of the Regulation 18 'Plan Making' Consultations and the Regulation 19 'Pre-Submission' Consultation, undertaken during the Local Plan Review process.

Shropshire Council also considers that the draft Shropshire Local Plan has been prepared in general accordance with public consultation requirements set out in national regulations, as well as those temporary amendments made to the regulations as a result of the Covid 19 pandemic, most notably Regulation 35 of the Town and Country Planning (Local Planning) (England) 2012.

## **3. With regard to the methods of engagement utilised:**

As documented above, throughout the Local Plan Review process, including all of the Regulation 18 'Plan Making' Consultations and the Regulation 19 'Pre-Submission' Consultation, **EV008.03** has informed decisions on the scope and nature of engagement and consultation undertaken.

It is important to note that the identified methods available to inform and engage communities within **EV008.03** do include a focus on digital/electronic mechanisms, which are locally and nationally recognised as a crucial means of engagement. The ability for the Council to utilise these means, in particular the use of social media to promote consultations and events, has increased through the course of the Local Plan's preparation. With specific regard to **EV008.03**, identified digital methods available to inform and engage communities include:

- a. Direct email communication, including updates and notifications to those on the consultation database.



- b. Communications to Town and Parish Council's, distributed via the Shropshire Association of Local Councils (SALC) using email communication.
- c. The Shropshire Council website to provide information on consultations, consultation events and allow the viewing of documentation.
- d. Social media to provide alerts about consultations, consultation events and direct people to the consultation website.
- e. Local media and council publications including electronic press-releases/newsroom.

It is also important to note that the methods of informing and engaging communities outlined within Table 4.2 and Table 4.3 of **EV008.03** represent examples of the different mechanisms available during the plan making process, and it is intended that suitable flexibility is needed in defining the right type and mix of methods for specific consultation stages and to inform ongoing continuous engagement. This is emphasised in paragraph 4.6 of **EV008.03**, which states *“there can never be a ‘one size fits all’ approach to community involvement, and that in seeking to implement the guiding principles outlined in section 2, councils should always seek to be proportionate and cost effective in the way they engage”*.

Paragraph 4.9 of the 2014 SCI (**EV008.03**) emphasises the importance of key groups in the process, namely Parish and Town Councils and elected councillors. Parish and Town Councils in particular are seen as an effective ‘first point of contact’ for community involvements and a means to galvanise and express local issues and concerns. The activities undertaken to support all the consultations undertaken under both Regulation 18 and 19, show how this engagement was achieved. It is noted that paragraph 4.9 also references Local Joint Committees (LJCs) as a means of engagement. The LJCs were officially stopped as an entity in July 2021, although they had been phased out from 2018 onwards. Therefore, whilst some engagement through this means was possible through the early stages of Regulation 18, this was not possible during later consultation stages. However, it is noted the LJC's themselves were made up of representatives from respective Town and parish Councils, as well as Shropshire Council's elected councillors, and therefore it is considered these organisations and individuals were informed via other means.

The specific mechanisms considered appropriate for a particular consultation within the plan making process will depend on the nature and scope of the consultation. Paragraphs 4.5 and 4.6 of the 2014 SCI (**EV008.03**) clearly indicate that there should be flexibility about how the Council engages and that there is not a ‘one size fits all’ approach to community involvement. Indeed, the different purposes of the various consultations during the plan making process are specifically recognised within the second entry of Table 4.3 ‘Consultation Documents on Development Plan Documents’ which discusses the different roles of the different stages of the process, including topic papers, issues and options, preferred options and final plan publication. Furthermore, the explanations of the different mechanisms available to inform and engage communities during the plan making process specifically recognise that some aspects are suitable for specific stages of the plan making process.



With regard to the Final Plan Publication stage (Regulation 19) table 4.3 indicates that rather than seeking consultation views, the Council will ask the public for formal representations on the 'soundness' of the Final Plan, and that guidance on providing representations of 'soundness' will accompany the document. The methods the Council used to adhere to this are expanded upon below.

With regard to measures of engagement, which are referenced in Table 4.3 of the 2014 SCI (EV008.03) and referenced within ID14:

- a. Community drop-in events and presentations: Includes *"The type and stage of document will be a key factor in deciding what type of format is most suitable"* and *"Clearly a balance will need to be struck between the type and number of events arranged and the resources availability."*
- b. Stakeholder workshops: Includes *"Depending on the type and stage of the document, it will also be important to effectively engage local interest groups and relevant regional and national organisations directly."* and *"...this format can work well in attracting comments during the early part of the plan preparation process.."*
- c. Forums: Includes *"Existing forums can be an effective method of involving particular stakeholder groups..."*
- d. The Citizens Panel: recognises that this is not a method of consultation but a source of information to inform plan preparation, stating *"It will be important for work on emerging unitary planning documents to reflect the outcomes of the Citizen's Panel. This will be particularly useful in the early stages of plan development in setting out key planning issues for the county."*
- e. One to one meetings: Includes *"the Council will use one to one meetings, where these are requested and resources are available."*
- f. LSP groups (including access to the 3rd sector & hard to reach groups): Recognises the need for a coordinated approach to consultation, rather than specifying methods of undertaking consultation, *"In developing the Local Development Framework, it is crucial that a coordinated approach is taken to community involvement between the Planning Policy service and the Shropshire Partnership."* It should be noted the Shropshire Partnership has been disbanded.
- g. The Youth Panel: Includes *"Depending on the themes of any future event it may be important to seek that local planning issues are debated."* and *"where appropriate a planning officer could attend specified meetings"*.
- h. Exhibitions and road shows: Includes *"Depending on the type of document, a combination of exhibitions and road shows may be used to advertise its preparation."* and *"They will be used principally as part of the earlier stages of plan preparation..."*

The in-built flexibility to the application of these methods of engagement further recognises these methods are not prescriptive in nature. As such, it is not considered that the 2021 version of the SCI (**EV008.02**) represents a significant 'shift' to the approach of informing and engaging communities from that within **EV008.03**. As already specified, it is considered that each of the Regulation 18 'Plan Making' and the Regulation 19 'Pre-Submission' Consultations have been undertaken in accordance with



**EV008.03**, and given the general consistency between **EV008.03** and **EV008.02** it is also considered to have been consistent with **EV008.02**.

When the final Regulation 18 'Plan Making' Consultation and the Regulation 19 'Pre-Submission' Consultation commenced, social distancing as a result of Covid-19 was in effect. This of course had implications for the types of engagement activities undertaken.

However, Shropshire Council was very much aware of the guidance provided by the Ministry of Housing, Communities & Local Government (MHCLG – now DLUHC) including through various Letters to Chief Planning Officers to continue preparation of Local Plans. This included:

- a. Correspondence from March 2020 (Appendix 1) which included *"We understand that local planning authorities may also be concerned about the implications of COVID-19 on their capacity to prepare and progress local plans and support neighbourhood planning. We encourage all local planning authorities to continue, as much as possible, to work proactively with their community and other stakeholders to progress plans, even if some adjustments to timetables are necessary."*
- b. Correspondence from July 2020 (Appendix 2) which included *"We have taken on board concerns raised by local planning authorities and other stakeholders about the implications of Covid-19 on the ability to progress plan making. We have already published guidance on reviewing and updating the statement of community involvement. The following changes all apply until 31 December 2020. "New legislation has now come into force for local development documents (amending, on a temporary basis, regulations 35 and 36 of the Town and Country Planning (Local Planning) (England) Regulations 2012). We have also brought forward secondary legislation in relation to spatial development strategies (amending the Town and Country Planning (London Spatial Development Strategy) Regulations 2000 and the Combined Authorities (Spatial Development Strategy) Regulations 2018) which will come into force on 12 August 2020. These changes remove requirements to make certain documents available for inspection at premises and to provide hard copies on request. The documents must, instead, be made available for inspection online. This will support local planning authorities and mayoral combined authorities to continue to progress up-to-date Local Plans and spatial development strategies. Planning practice guidance has also been updated outlining how local planning authorities and mayoral combined authorities should consider the practical measures needed to ensure fair participation is possible."*
- c. Correspondence from December 2020 (Appendix 3) which included *"Earlier in the year, in response to concerns raised by local planning authorities and other stakeholders about the implications of Covid-19 on plan making, we published guidance on reviewing and updating statements of community involvement and on how authorities should consider the practical measures needed to ensure fair participation is possible at this time. We also temporarily removed legal*





*requirements to make certain development plan documents available for inspection at premises and to provide hard copies on request. The documents must, instead, be made available for inspection online. These temporary changes expire on 31 December 2020 and because of the continuing uncertainty about the spread of Covid-19, these Regulations roll forward these changes for another 12 months to 31 December 2021. These further temporary changes will support local planning authorities and mayoral combined authorities to continue to progress up-to-date Local Plans and spatial development strategies. They do not prevent authorities from providing hard copies on request or at premises where they are confident that it is safe to do so.”*

With regard to the referenced guidance regarding updating the Statement of Community Involvement, this included *“Where any of the policies in the Statement of Community Involvement cannot be complied with due to current guidance to help combat the spread of coronavirus (COVID-19), the local planning authority is encouraged to undertake an immediate review and update the policies where necessary so that plan-making can continue.”*<sup>1</sup> Shropshire Council concluded that given the flexibility regarding the methods utilised to inform and engage communities at the various stages of consultation within **EV008.03** that it remained appropriate to inform the scope and nature of consultation undertaken. To reiterate, Shropshire Council also considers that these consultations were in general conformity with the requirements of **EV008.03**.

## **Schedule of approach and events to consultation at each stage of Consultation under Regulation 18 and Regulation 19**

The Regulation 19 ‘Pre-Submission’ Consultation was publicised through a number of means, including:

- a. At the start of the consultation, the Council issued an email to all parties on its Consultee Database providing information on the consultation and how to respond. The consultee database is made up of roughly 4,000 consultees, ranging from statutory (specific) organisations; general consultation bodies; and local consultation bodies; along with many individual residents. Interested parties, including individual residents, can be included on this Consultation Database by submitting a request to the Shropshire Council Planning Policy Team and providing appropriate contact email address.
- b. When the Council extended the consultation period on the 26<sup>th</sup> January 2021 by three weeks (10 week consultation in total) as a result of the Covid-19 related national lockdown, a further email was issued to all parties on the Consultee Database advising them that the consultation period was being extended and re-providing information on the consultation and how to respond.

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<sup>1</sup> DLUHC (then MHCLG), National Planning Practice Guidance (NPPG): Plan Making, Paragraph: 077  
Reference ID: 61-077-201200513



- c. In advance of the consultation, Elected Members were notified of the preparation of the document and the forthcoming consultation.
- d. At the start of the consultation, the Council issued an email to Shropshire Association of Local Council (SALC) (the body which represents all parish and Town Councils in Shropshire) providing information on the consultation and how to respond. This was circulated to all Town and Parish Councils.
- e. When the Council extended the consultation period as a result of the Covid-19 related national lockdown a further email was issued to SALC advising them that the consultation period was being extended and re-providing information on the consultation and how to respond. This was circulated to all Town and Parish Councils.
- f. Notification of the consultation was provided on the 'Get Involved' element of the Shropshire Council website and a dedicated 'Get Involved' consultation webpage was established: <https://shropshire.gov.uk/get-involved/Reg-19-Pre-Submission-Draft-Local-Plan>
- g. Notification of the consultation was provided on the Local Plan Review element of the Shropshire Council website, with a link provided to the 'Get Involved' consultation webpage.
- h. A 'service area banner' was provided on the Local Plan element of the Shropshire Council website, specifying that the consultation was occurring.
- i. Social Media was utilised to provide notifications relating to the consultation, this is considered a particularly effective method of reaching hard to reach groups who are less likely to engage through more traditional approaches. This included:
  - i. When the proposal to consult on the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan was to be considered by Shropshire Council's Cabinet (Facebook post issued on 13<sup>th</sup> November 2020 – this was viewed by an estimated 3,304 people; and Twitter post issued on the 13<sup>th</sup> November 2020 – this was seen 1,514 times).
  - ii. When the Regulation 19 'Pre-Submission' Consultation commenced (Facebook post issued on 18<sup>th</sup> December 2020 – this was viewed by an estimated 2,855 people; and Twitter post was issued on the 18<sup>th</sup> December 2020 – this was seen 2,163 times).
  - iii. Also at the start of the Regulation 19 'Pre-Submission' Consultation (Facebook post issued on 21<sup>st</sup> December 2020 (no analytics data available); and Twitter post was issued on the 21<sup>st</sup> December 2020 – this was seen 2,267 times).
  - iv. When the consultation period was extended as a result of the Covid-19 related national lockdown (two Facebook posts issued on 26<sup>th</sup> January 2021 – viewed by an estimated 7,116 people and 4,425 people respectively; and two



Twitter posts issued on 26<sup>th</sup> January 2021 – seen 3,171 times and 2,621 times respectively).

- v. To provide a reminder that the Regulation 19 ‘Pre-Submission’ Consultation was ongoing but would close in two weeks (Facebook post issued on 12<sup>th</sup> February 2021 – this was viewed by an estimated 5,226 people; and Twitter post issued on 12<sup>th</sup> February 2021 - this was seen 2,023 times).
- j. Press releases and newsroom articles were utilised to provide notifications relating to the consultation. This included:
  - i. In advance of Shropshire Council Cabinet consideration of the proposal to consult on the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (newsroom article published on the 13<sup>th</sup> November 2020: <https://newsroom.shropshire.gov.uk/2020/11/local-plan-cabinet/>)
  - ii. At the start of the Regulation 19 ‘Pre-Submission’ Consultation (newsroom article published on the 21<sup>st</sup> December 2021 <https://newsroom.shropshire.gov.uk/2020/12/local-plan-consultation-2/>)
  - iii. When the consultation period was extended as a result of the Covid-19 related national lockdown (newsroom article published on the 26<sup>th</sup> January 2021 <https://newsroom.shropshire.gov.uk/2021/01/local-plan-consultation-extended/>)
  - iv. There were numerous articles relating to the consultation within the Local Press, including in advance of the decision by Shropshire Council Cabinet to approve the Regulation 19 ‘Pre-Submission’ consultation, following the decision and in advance of the commencement of the Pre-Submission consultation, and during the consultation. This included:  
<https://www.bordercountiesadvertiser.co.uk/news/18904286.reprieve-oswestry-housing-development-site/>  
<https://www.shropshirelive.com/news/2020/11/13/local-plan-set-to-go-before-shropshire-councils-cabinet/>  
<https://www.shropshirestar.com/news/local-hubs/bridgnorth/2020/11/27/proposals-for-bridgnorth-garden-village-and-shifnal-development-remain-unchanged-in-updated-plan/>  
<https://www.sunshineradio.co.uk/ludlow/news/local-news/controversial-housing-sites-dropped-from-local-plan/>  
<https://www.whitchurchherald.co.uk/news/18921444.north-shropshire-towns-will-fit-30-000-new-homes-plan/>  
<https://www.shropshirestar.com/news/property/2020/12/07/d-day-over-shropshire-council-plans-for-30000-homes/>  
<https://www.sunshineradio.co.uk/ludlow/news/local-news/final-public-consultation-on-local-plan-to-begin-next-week/>  
<https://www.shropshirestar.com/news/property/2020/12/07/town-by-town-where-shropshires-30000-new-homes-will-be-built/>





<https://www.shropshirestar.com/news/local-hubs/bridgnorth/2020/12/08/final-consultation-to-begin-on-future-development-in-shropshire-despite-calls-to-delay-the-process/>

<https://www.shropshirestar.com/news/politics/2021/01/26/local-plan-consultation-extended/>

<https://www.shropshirelive.com/news/2021/01/26/shropshire-councils-local-plan-consultation-extended-by-three-weeks/>

<https://www.bordercountiesadvertizer.co.uk/news/19038948.shropshire-council-local-plan-consultation-deadline-delayed/>

<https://www.sunshineradio.co.uk/ludlow/news/local-news/campaigners-welcome-local-plan-consultation-extension-but-say-its-still-not-enough/>

<https://www.whitchurchherald.co.uk/news/19038951.shropshire-council-local-plan-consultation-deadline-delayed/>

There were also a number of articles expressing the views of parties that had concerns about proposals within the draft Shropshire Local Plan and encouraging the submission of representations from those with similar views.

It is considered that these methods of publicity effectively reached interested parties, including those within hard to reach groups. Indeed, the use of social media is expressly identified in the then adopted SCI (EV008.03), the use of the 'free press' and social media are considered to be particularly effective at engaging with hard to reach groups.

During the Regulation 19 'Pre-Submission' Consultation, documents were made available for inspection in a number of ways:

- a. The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, supporting documents and evidence base were made available to view on the Shropshire Council website via the dedicated 'Get Involved' Webpage:  
<https://shropshire.gov.uk/get-involved/Reg-19-Pre-Submission-Draft-Local-Plan>
- b. Computer/tablet facilities at the 'Shropshire Local' Shop in the Darwin Shopping Centre, Shrewsbury could be utilised to view the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, supporting documents and evidence base via the Shropshire Council website - staff were provided guidance on how to assist individuals wishing to use computer/tablet facilities for this purpose\*.
- c. Computer/tablet facilities at Albrighton, Bayston Hill, Bishop's Castle, Bridgnorth, Broseley, Church Stretton, Cleobury Mortimer, Craven Arms, Ellesmere, Gobowen, Highley, Ludlow, Market Drayton, Much Wenlock, Oswestry, Pontesbury, Shifnal, Shrewsbury, Wem and Whitchurch libraries could be utilised to view the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, supporting documents and evidence base via the Shropshire Council website - library staff were provided guidance on how to assist individuals wishing to use computer/tablet facilities for this purpose\*.



- d. Hard copies of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan were available to view in Albrighton, Bayston Hill, Bishop's Castle, Bridgnorth, Broseley, Church Stretton, Cleobury Mortimer, Craven Arms, Ellesmere, Gobowen, Highley, Ludlow, Market Drayton, Much Wenlock, Oswestry, Pontesbury, Shifnal, Shrewsbury, Wem and Whitchurch libraries - library staff were provided guidance on how to assist individuals wishing to access these hard copies\*.
- e. Tablet facilities at the Council's main office of the Shirehall could be utilised to view the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, supporting documents and evidence base via the Shropshire Council website - staff were provided guidance on how to assist individuals wishing to use tablet facilities for this purpose\*.
- f. Hard copies of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan were available to view at the Council's main office of the Shirehall\*.

*\*As a result of the Covid-19 related national lockdown which came into force on the 5<sup>th</sup> January 2021, the ability to access these facilities was restricted. Following the introduction of the Covid-19 related national lockdown Shropshire Council offered to provide paper copies of all or part the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan document and the two-part representation form in the post – where the individual was unable to access the document electronically. This was advertised both on the Council website and via posters at the above referenced facilities. A number of such requests were received and fulfilled.*

Following the completion of this consultation an extensive summary of the representations received was prepared. This included a high-level summary (by matter/policy) of the key issues raised, within duly-made representations received, including those of soundness, legal compliance and compliance with the duty to cooperate; and a high-level summary of the duly-made representations received and a high-level Shropshire Council response to each of these consultations. These representations were carefully considered before the decision to seek approval from Full Council to submit the draft Shropshire Local Plan for examination was made. They also informed the decision by Full Council to approve the submission of the draft Shropshire Local Plan for examination.

As already specified, the iterative approach to the preparation of the draft Shropshire Local Plan allowed for a number of Regulation 18 'Plan Making' consultations, providing extensive opportunities for interested parties to 'get involved' early and on an ongoing basis in the preparation of the draft Shropshire Local Plan and also allowed Shropshire Council to proactively engage with interested parties. Responses received to these consultations were carefully considered and informed subsequent proposals as the preparation of the draft Shropshire Local Plan continued. The consultation process undertaken for each of the Regulation 18 'Plan Making' consultations can be summarised as follows:



During the Regulation 18 Issues and Strategic Options Consultation which ran for eight weeks between 23<sup>rd</sup> January 2017 and 20<sup>th</sup> March 2017:

- a. At the start of the consultation, the Council issued an email to all parties on its Consultee Database providing information on the consultation and how to respond.
- b. In advance of the consultation, Elected Members were notified.
- c. At the start of the consultation, the Council issued an email to SALC providing information on the consultation and how to respond. This was circulated to all Town and Parish Councils.
- d. A press release was issued promoting the consultation.
- e. A series of events were undertaken with Town and Parish Council's through SALC providing information on proposals, the consultation and how to respond. These events were:
  - i. Central SALC Committee at the Guildhall, Shrewsbury starting at 7:00pm on the 26<sup>th</sup> January 2017.
  - ii. East SALC Committee at the Severn Centre, Highley starting at 7:00pm on the 24<sup>th</sup> January 2017.
  - iii. North SALC Committee at Edinburgh House, Wem starting at 7:15pm on the 20<sup>th</sup> February 2017.
  - iv. Oswestry SALC Committee at the Guildhall, Oswestry starting at 7:00pm on the 7<sup>th</sup> February 2017.
  - v. South SALC Committee at the Methodist Hall, Craven Arms starting at 7.30pm on the 2<sup>nd</sup> February 2017.
- f. Shropshire Council Planning Policy Officers attended a meeting of the Shropshire Business Board on 16<sup>th</sup> January 2017 to discuss and promote the consultation.
- g. Documents were made available for inspection in a number of ways, including:
  - i. Electronically via the Shropshire Council 'Get Involved' component of the Shropshire Council website – a link to this 'Get Involved' page was provided from the Planning Policy component of the Shropshire Council website.
  - ii. Hard copies at Council Offices in Shrewsbury, Wem, Oswestry and Craven Arms.
  - iii. Hard copies at all Shropshire Council libraries.
- h. Following the completion of this consultation a summary of the responses received was prepared.

During the Preferred Scale and Distribution of Development Consultation which ran for eight weeks between 27<sup>th</sup> October 2017 to 22<sup>nd</sup> December 2017:



- a. At the start of the consultation, the Council issued an email to all parties on its Consultee Database providing information on the consultation and how to respond.
- b. At the start of the consultation, the Council issued an email to SALC providing information on the consultation and how to respond. This was circulated to all Town and Parish Councils.
- c. In advance of the consultation, Elected Members were notified.
- d. A press release was issued promoting the consultation.
- e. A series of events were undertaken with Town and Parish Council's through SALC providing information on proposals, the consultation and how to respond. These events were:
  - i. Central SALC Committee at the Guildhall, Shrewsbury starting at 6:30pm on the 18<sup>th</sup> October 2017.
  - ii. East SALC Committee at the Severn Centre, Highley – 22<sup>nd</sup> November 2017.
  - iii. North SALC Committee at Edinburgh House, Wem – 16<sup>th</sup> October 2017 at 7pm.
- f. Shropshire Council officers also attended a meeting of the county's Developer Panel at 2:00pm on the 23<sup>rd</sup> November 2017 to present information on the consultation.
- g. Shropshire Council officers attended a meeting of the Shropshire Town and Parish Council Forum on 23<sup>rd</sup> November 2017 at the Guildhall, Shrewsbury, to present information on the consultation.
- h. On request, a planning policy officer attended the Parish Council meeting at Ford on 14<sup>th</sup> November 2017 to present information on the consultation.
- i. On request, a Shropshire planning policy officer attended the Shrewsbury Local Joint Committee on 27<sup>th</sup> November 2017 to present information on the consultation.
- j. Documents were made available for inspection in a number of ways, including:
  - i. Electronically via the Shropshire Council 'Get Involved' component of the Shropshire Council website – a link to this 'Get Involved' page was provided from the Planning Policy component of the Shropshire Council website.
  - ii. Hard copies at Council Offices in Shrewsbury, Wem, Oswestry and Craven Arms.
  - iii. Hard copies at all Shropshire Council libraries.
- k. Following the completion of this consultation a summary of the responses received was prepared.



During the Preferred Sites Consultation which ran for 10 weeks between 29<sup>th</sup> November 2018 and 8<sup>th</sup> February 2019:

- a. At the start of the consultation, the Council issued an email to all parties on its Consultee Database providing information on the consultation and how to respond.
- b. At the start of the consultation, the Council issued an email to SALC providing information on the consultation and how to respond. This was circulated to all Town and Parish Councils.
- c. In advance of the consultation, Elected Members were notified.
- d. A press release was issued promoting the consultation.
- e. Public meetings (generally lasting around 2 hours) providing information on proposals, the consultation and how to respond were undertaken – one per Place Plan Area. These events were:
  - i. Albrighton Place Plan Area Event at the Red House, Albrighton Village Hall, Albrighton – 22<sup>nd</sup> January 2019.
  - ii. Bishop's Castle Place Plan Area Event at Bishop's Castle Public Hall Bishop's Castle starting at 6:00pm on the 21st January 2019.
  - iii. Bridgnorth Place Plan Area Event at Castle Hall, Bridgnorth starting at 7:00pm on the 17<sup>th</sup> January 2019.
  - iv. Broseley Place Plan Area Event at Victoria Hall, Broseley starting at 18:00 on the 14<sup>th</sup> January 2019.
  - v. Church Stretton Place Plan Area Event at the Parish Centre, Church Stretton starting at 7:00pm on the 16<sup>th</sup> January 2019.
  - vi. Ellesmere Place Plan Area Event at Ellesmere Town Hall, Ellesmere starting at 7:00pm on the 10<sup>th</sup> January 2019.
  - vii. Highley Place Plan Area Event at the Severn Centre, Highley starting at 6:30pm on the 9<sup>th</sup> January 2019.
  - viii. Ludlow Place Plan Area Event at Ludlow Elim Christian Church on the 14<sup>th</sup> January 2019.
  - ix. Market Drayton Place Plan Area Event at Market Drayton – 8<sup>th</sup> January 2019.
  - x. Minsterley and Pontesbury Place Plan Area Event at Habberley Village Hall, Habberley near Pontesbury, starting at 7:00pm on the 9<sup>th</sup> January 2019.
  - xi. Much Wenlock Place Plan Area Event at Priory Hall, Much Wenlock starting at 7:00pm on the 3<sup>rd</sup> January 2019.
  - xii. Oswestry Place Plan Area Event at Oswestry – 15<sup>th</sup> January 2019.
  - xiii. Shrewsbury Town Event at the Guildhall, Shrewsbury – 16<sup>th</sup> January 2019.





- xiv. Shrewsbury Rural North Event at the Guildhall, Shrewsbury – 17<sup>th</sup> January 2019.
  - xv. Shrewsbury Rural South Event at the Guildhall, Shrewsbury starting at 7:00pm on the 24<sup>th</sup> January 2019.
  - xvi. Shifnal Place Plan Area Event at Shifnal Village Hall, Shifnal starting at 6:00pm on the 14<sup>th</sup> December 2018.
  - xvii. Wem Place Plan Area Event at Edinburgh House, Wem at 7pm on the 11<sup>th</sup> December 2018.
  - xviii. Whitchurch Place Plan Area Event at Whitchurch Civic Centre at 7pm on 11<sup>th</sup> January 2019.
- f. On request, officers also attended meetings at the following to present information on and promote the consultation:
- i. Shrewsbury Town Council on 12<sup>th</sup> November 2018.
  - ii. Clive Parish Meeting on 3<sup>rd</sup> January 2019.
  - iii. The SALC Central Area Committee meeting on 15<sup>th</sup> November 2018.
  - iv. The North SALC Area Committee meeting on 19<sup>th</sup> November 2018.
- g. Documents were made available for inspection in a number of ways, including:
- i. Electronically via the Shropshire Council 'Get Involved' component of the Shropshire Council website – a link to this 'Get Involved' page was provided from the Planning Policy component of the Shropshire Council website.
  - ii. Hard copies at Council Offices in Shrewsbury, Wem, Oswestry and Craven Arms.
  - iii. Hard copies at all Shropshire Council libraries.
- h. Following the completion of this consultation a summary of the responses received was prepared.

During the Strategic Sites Consultation which ran for 10 weeks between 1<sup>st</sup> July 2019 and 9<sup>th</sup> September 2019:

- a. At the start of the consultation, the Council issued an email to all parties on its Consultee Database providing information on the consultation and how to respond.
- b. At the start of the consultation, the Council issued an email to SALC providing information on the consultation and how to respond. This was circulated to all Town and Parish Councils.
- c. In advance of the consultation, Elected Members were notified.
- d. A press release was issued promoting the consultation.



- e. Public meetings providing information on proposals, the consultation and how to respond were undertaken. These events were:
  - i. RAF Cosford and Junction 3 Event at the RAF Museum Cosford at 7:00pm on the 10<sup>th</sup> July 2019.
  - ii. Former Ironbridge Power Station Event at Buildwas Village Hall at 7:00pm on the 17<sup>th</sup> July 2019.
  - iii. Clive Barracks, Tern Hill Event at Stoke upon Tern Village Hall at 7:00pm on the 18<sup>th</sup> July 2019.
- f. Documents were made available for inspection in a number of ways, including:
  - i. Electronically via the Shropshire Council 'Get Involved' component of the Shropshire Council website – a link to this 'Get Involved' page was provided from the Planning Policy component of the Shropshire Council website.
  - ii. Hard copies at Council Offices in Shrewsbury, Wem, Oswestry and Craven Arms.
  - iii. Hard copies at all Shropshire Council libraries.
- g. Following the completion of this consultation a summary of the responses received was prepared.

During the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan Consultation which ran for eight weeks from 3<sup>rd</sup> August 2020 to 30<sup>th</sup> September 2020:

- a. At the start of the consultation, the Council issued an email to all parties on its Consultee Database providing information on the consultation and how to respond.
- b. At the start of the consultation, the Council issued an email to SALC providing information on the consultation and how to respond. This was circulated to all Town and Parish Councils.
- c. In advance of the consultation, Elected Members were notified.
- d. Social media was utilised to promote the consultation.
- e. A press release was issued promoting the consultation.
- f. A '*Right Home, Right Place*' article which addressed the importance of the Local Plan in providing homes, summarised some of the key draft policies and highlighted the ongoing consultation: [www.righthomerightplace.co.uk/how-the-local-plan-could-shape-shropshires-housing/](http://www.righthomerightplace.co.uk/how-the-local-plan-could-shape-shropshires-housing/)
- g. A series of remote events were undertaken with Town and Parish Council's through SALC providing information on proposals, the consultation and how to respond. These events were:
  - i. Central SALC Committee starting at 6:00pm on the 10<sup>th</sup> September 2020.



- ii. East SALC starting at 7:00pm on the 7<sup>th</sup> September 2020.
- iii. North SALC Committee starting at 7:15pm on the 15<sup>th</sup> September 2020.
- iv. South SALC Committee starting at 7:30pm on the 8<sup>th</sup> September 2020.
- h. In addition, a virtual meeting was held with representatives from Bridgnorth Town Council and surrounding Parish Councils, with elected councillors, on 24<sup>th</sup> August 2020, specifically focussing on the proposed Tasley Garden Village proposal;
- i. Documents were made available for inspection in a number of ways, including:
  - i. Electronically via the Shropshire Council 'Get Involved' component of the Shropshire Council website – a link to this 'Get Involved' page was provided from the Planning Policy component of the Shropshire Council website.
  - ii. Electronic copies via computer/tablet facilities and selected hard copy documents at Council Offices in Shrewsbury (by appointment).
  - iii. Electronic copies via computer/tablet facilities and selected hard copy documents at selected Shropshire Council libraries.
- j. Following the completion of this consultation a summary of the responses received was prepared.

It should be noted that earlier iterations of the Local development Scheme (LDS) had identified this stage as the pre-Submission Regulation 19. However, it was decided that as a result of some significant changes to proposed site allocations from earlier iteration of the Plan (most notably in relation to Bridgnorth) that there should be a further opportunity for communities to have their say on proposals at the 'Plan making' Regulation 18 stage. This decision specifically recognised the different nature of the regulation 18 and 19 stages of involvement, as emphasised in the SCI **(EV008.03)**

As documented within **EV008.03**, continuous engagement is considered important during the plan making process. As such, during the Local Plan Review process, Shropshire Council undertook extensive proactive engagement outside of the Regulation 18 'Plan Making' and Regulation 19 'Pre-Submission' consultations. This included through:

- a. Careful consideration of information emerging from engagement and consultations undertaken to inform other relevant Shropshire Council documents.
- b. Developer and agent forums at appropriate stages during the plan making process.
- c. Strategic Infrastructure Forums at appropriate stages during the plan making process.
- d. Various stakeholder workshops and meetings with individual or groups of Town and Parish Councils, including to provide updates on and seek information to inform the Local Plan Review and its associated evidence base (for instance the Hierarchy of Settlements, site assessment process, and Place Plans).



- e. Meetings and duty to cooperate discussions with various statutory bodies and adjoining and closely related Local Planning Authorities.
- f. Stakeholder workshops to inform the preparation of key evidence base documents such as the Green Infrastructure Strategy (EV052) and the Viability Study (EV115).
- g. The establishment of Steering Groups involving key stakeholders to inform the preparation of key evidence base documents such as the Water Cycle Study (EV117) and Strategic Flood Risk Assessments (Stage 1 and 2 – EV095 and EV096).
- h. One to one meetings, where requested, with site promoters.
- i. One to one meetings, where requested, with interest and/or community groups (such as CPRE and Civic Societies).
- j. One to one meetings, where requested, with interested individuals (including those objecting to specific proposals or sites) seeking information or wishing to input into the Local Plan Review process.
- k. Encouragement of site promoters to undertake exhibitions/drop-in sessions regarding their site promotions with the local community and appropriate consideration of the results of this engagement.

#### **4. With regard to whether any prejudice has occurred in light of the circumstances:**

Shropshire Council strongly believes that the engagement process undertaken throughout the Local Plan Review, including all stages of Regulation 18 ‘Plan Making’ Consultation and the Regulation 19 ‘Pre-Submission’ stage, has been effective in promoting the Local Plan Review process and the various stages of consultation undertaken, ensuring that interested parties have an appropriate opportunity to engage in the Local Plan Review process and the various stages of consultation undertaken, and identifying the views of interested parties. These views have been carefully considered and informed subsequent proposals.

This view is supported by the strong response rates received to the various stages of consultation undertaken, which can be summarised as follows:

- a. Around 400 unique respondents to the 8-week Issues and Strategic Options consultation;
- b. Around 600 unique respondents to the 8-week Preferred Scale and Distribution of Development consultation;
- c. Around 3,600 unique respondents to the 12-week Preferred Sites consultation;
- d. Around 2,300 unique respondents to the 10-week Strategic Sites consultation;



- e. Around 2,500 unique respondents to the 8-week Regulation 18: Pre-Submission Draft of the Shropshire Local Plan consultation; and
- f. 683 respondents – equating to 2,443 individual representations - to the 10-week Regulation 19: Pre-Submission Draft of the Shropshire Local Plan consultation.

**As such, Shropshire Council strongly considers that no prejudice has occurred as a result of the approach taken to engagement and consultation.**

**Indeed, the iterative approach to the preparation of the draft Shropshire Local Plan, and the opportunities for continuous engagement and the number of Regulation 18 ‘Plan Making’ consultations resulting from this iterative approach, have provided extensive opportunities for interested parties to ‘get involved’ early and on an ongoing basis in the preparation of the draft Shropshire Local Plan. This has allowed Shropshire Council to proactively engage and consider the views of interested parties. Information obtained during the engagement process, including responses received to the Regulation 18 ‘Plan Making’ consultations, was carefully considered and informed subsequent proposals as the preparation of the draft Shropshire Local Plan continued.**

**The Regulation 19 ‘Pre-Submission’ Pre-Submission Representation Stage then provided interested parties with the opportunity to submit representations on the soundness, legal compliance and/or compliance with the duty to cooperate of the draft Shropshire Local Plan.**

**5. With regard to identifying concerns regarding the Statement of Community Involvement, the consultation process undertaken and consideration of consultation responses:**

Shropshire Council considers that the concerns raised within the Matter 1 Hearing Statements as referenced within ID14 were appropriately highlighted within Schedule 1 of the Consultation Response Summary (**SD014.01**) and the subsequent update to this document (**GC4o**) prepared in response to Paragraphs 4-6 of ID2. Specifically, the summary of General / Overarching Comments included:

**Key Issues Raised Including Those of Soundness, Legal Compliance and Compliance with the Duty to Cooperate:**

*7. Consultation undertaken to inform the draft Shropshire Local Plan does not comply with the Statement of Community Involvement and/or legislation/legal requirements (Gunning Principles often referenced).*

*8. Responses to various stages of consultation have not been conscientiously considered.*

**Shropshire Council Response**

*7 and 8. Shropshire Council strongly considers that it has met the requirements of the Statement of Community Involvement. The consultation process undertaken is also considered to comply with the Gunning Principles and national legislation.*





7 and 8. Views expressed in response to the various 'Regulation 18' stage consultations have been considered, informing subsequent proposals, including those within the 'Regulation 19' Pre- Submission Draft of the Shropshire Local Plan.

7 and 8. It is recognised that there will sometimes be local opposition to proposals within 'Regulation 18' consultations. It is therefore necessary to assess the materiality of issues raised within consultation responses, rather than simply responding to the number of consultation responses on an issue. Where there has been disagreement or objection to proposals within responses to any stage of 'Regulation 18' consultation, which have not led to a subsequent change to proposals, this does not mean Shropshire Council has failed to consider these consultation responses. Rather it is the role of the Local Plan to balance the material considerations raised as part of the consultation process against a number of other issues, whether these be other consultation responses, evidence base documents, or the application of national planning policy. It is this 'planning balance' which is central to the Plan making process, with consultation responses informing the approach towards what Shropshire Council believes to be a 'sound' Plan when assessed against the requirements of the National Planning Policy Framework and legally compliant (including complying with the duty to cooperate) Plan when assessed against relevant legislation and national policy.

## 6. Conclusion

Shropshire Council considers that the Statement of Community Involvement (2011 version, updated in 2014) (**EV008.03**) was appropriate to inform the scope and nature of engagement and consultation undertaken during the Local Plan Review process.

Throughout the Local Plan Review process, including all of the Regulation 18 'Plan Making' Consultations and the Regulation 19 'Pre-Submission' Representations Stage, it is **EV008.03** that has informed decisions on the scope and nature of engagement and consultation undertaken.

Shropshire Council firmly believes that the engagement undertaken during the Local Plan Review process, including all of the Regulation 18 'Plan Making' Consultations and the Regulation 19 'Pre-Submission' Consultation, was in conformity with the requirements of **EV008.03**.

The iterative approach to the preparation of the draft Shropshire Local Plan, and the opportunities for continuous engagement and the number of Regulation 18 'Plan Making' consultations resulting from this iterative approach, have provided extensive opportunities for interested parties to 'get involved' early and on an ongoing basis in the preparation of the draft Shropshire Local Plan. This has allowed Shropshire Council to proactively engage and consider the views of interested parties. Information obtained during the engagement process, including responses received to the Regulation 18 'Plan Making' consultations, was carefully considered and informed subsequent proposals as the preparation of the draft Shropshire Local Plan continued. The Regulation 19 'Pre-Submission' consultation then provided interested parties with the opportunity to submit representations on the soundness, legal compliance and/or compliance with the duty to cooperate.



The methods of continuous engagement and consultation processes utilised during the Local Plan Review, as summarised within this response, have been effective and as such Shropshire Council would reiterate that it strongly considers that no prejudice has occurred as a result of the approach taken to consultation. Indeed, Shropshire Council considers that interested parties, including hard to reach groups, have been effectively engaged during the Local Plan Review process.

Yours sincerely

Eddie West  
Planning Policy and Strategy Manager  
Shropshire Council

