

Part B: Your Response

Please complete a separate **Part B form** for each response that you wish to make. One **Part A form** must be enclosed with your **Part B form(s)**.

To assist in making a response, separate **Guidance** is available on the Council's website. Responses should be returned by **5:00pm on Tuesday 11th June 2024**.

Name and Organisation:	Jemma Shorrocks, Boyer on behalf of Highley LVA LLP
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Q1. To which document(s) does this response relate?

a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	<input type="checkbox"/>
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	<input type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input checked="" type="checkbox"/>
d. Updated Green Belt Topic Paper.	<input type="checkbox"/>

Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s): 2.2, 5.2, 2.5, 2.10, 2.12, 8.34, 2.14, 2.21, 2.34, 2.37, and 16.118.

Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s).

Please be as precise as possible.

Please find comments on the specified paragraphs above within the submitted Written Representations on behalf of Highley LVA LLP.

(Please continue on a separate sheet if necessary)

Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.

Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.

- No, I do not wish to/consider it necessary to participate in hearing session(s)
- Yes, I consider it is necessary/wish to participate in hearing session(s)

The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.

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Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	6.8, 8.8, 8.90, 10.3, 10.4, 9.14, 10.6, 10.61, 7.8, 9.106, 11.3, 11.4, 11.6, 11.60, 12.30, 12.31, 12.38, 12.23, 12.1, 13.11, and 13.54.
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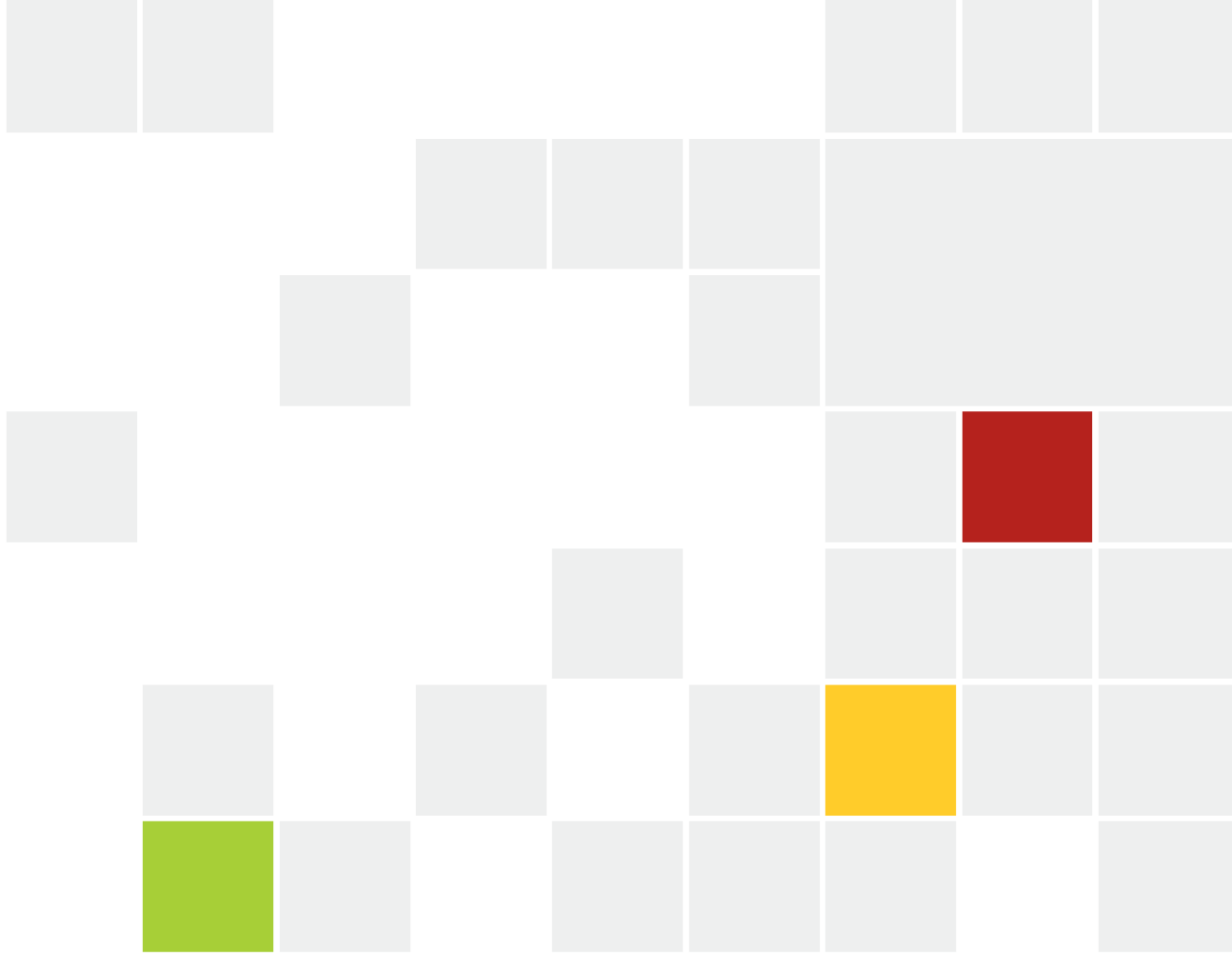
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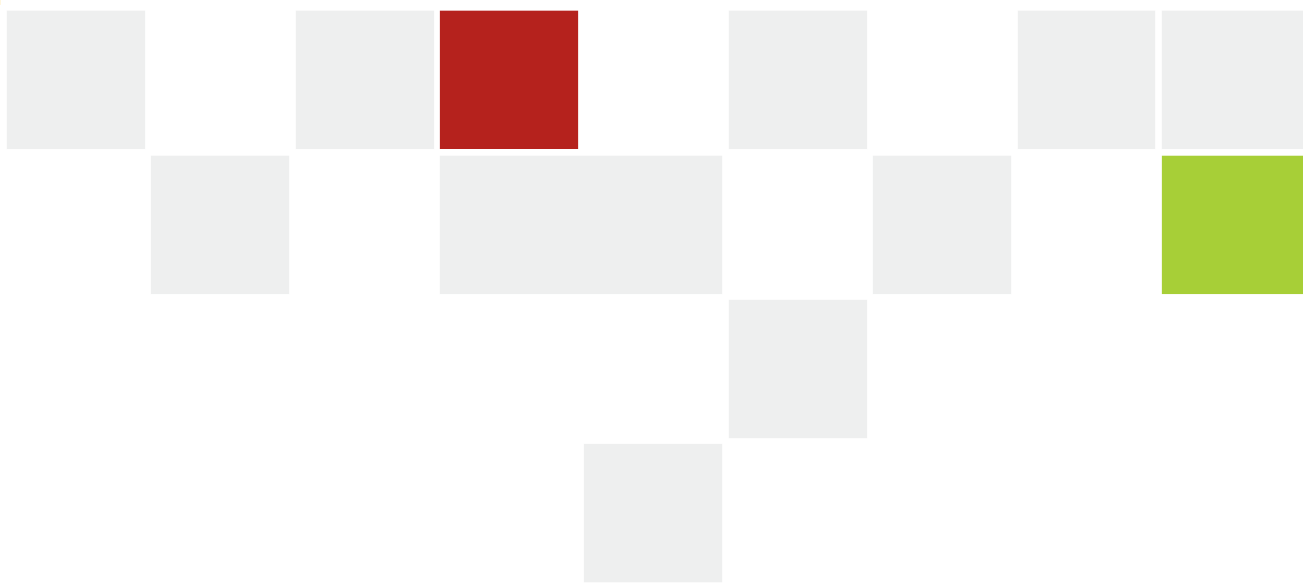
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Netherton Lane, Highley

Draft Shropshire Local Plan Consultation



Prepared on behalf of Highley LVA LLP | June 24

Boyer

REPORT CONTROL

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APPENDICES

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Appendix 5. Ecological Constraints and Opportunities Plan

Appendix 6. Preliminary Flood & Drainage Appraisal

Appendix 7. Access & Accessibility Technical Note

1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Highley LVA LLP ('LVA'), in response to the Shropshire Draft Local Plan Consultation for the promotion of land off Netherton Lane, Highley ('The Site').
- 1.2 The site extends to approximately 26.62 hectares (ha) (65.77 acres) in size and comprises several agricultural fields that are bordered by hedgerows that are under the control of LVA. Access is currently available from the western and southern boundary via Netherton Lane, and from the eastern boundary via Silverdale Terrace. The location of the site is illustrated in **Appendix 1** of this Supporting Statement.
- 1.3 These representations respond to the relevant policies. Consideration has been given to the tests of soundness required to be met, as set out by Paragraph 35 of the NPPF (2023), including whether the Local Plan is:
- a) **Positively prepared** – providing a strategy which as a minimum seeks to meet the area's objectively assessed needs;
 - b) **Justified** – provides an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence;
 - c) **Effective** - deliverable over the plan period and based on effective joint working; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development.
- 1.4 These Written Representations are supported by the following technical reports which are appended to this Supporting Statement:
- Vision Document, prepared by Pegasus Design see **Appendix 2**;
 - Framework Masterplan, prepared by Pegasus Design see **Appendix 3**;
 - Preliminary Ecological Survey, prepared by GE Consulting see **Appendix 4**;
 - Ecological Constraints and Opportunities Plan, prepared by GE Consulting see **Appendix 5**;
 - Preliminary Flood and Drainage Appraisal, prepared by Sustain Environmental see **Appendix 6**; and
 - Access and Accessibility Technical Note, prepared by Neil Brant Consulting see **Appendix 7**.

2. RESPONSE TO DRAFT SHROPSHIRE LOCAL PLAN CONSULTATION

2.1 LVA have reviewed the following updated LP Consultation documents, and provide comment to each document in turn:

- Updated Additional Sustainability Appraisal (SA) of the Draft Shropshire Local Plan Report; and
- Updated Housing and Employment Topic Paper.

Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report

Identification of Reasonable Options for any Contribution to the Unmet Housing Needs Forecast to Arise in the Black Country

2.2 At Paragraph 6.8 of the SA the Council sets out two scenarios for meeting the housing needs of the Black Country:

- a) Option 1: No contribution towards the unmet housing needs forecast to arise within the Black Country; and
- b) Option 2: Contribution of 1,500 dwellings towards the unmet housing needs forecast to arise within the Black Country.

2.3 In line with the conclusions by the Council, LVA strongly support Option 2: '1,500 Dwelling Contribution' due to the following reasons:

- We agree that the higher provision of housing will help support the Council in the delivery of SA Objective 3: provision of a sufficient amount of good quality housing which meets the needs of all sections of society in the short, medium and long term.
- Contributing towards the unmet housing needs of the Black Country will help meet the Council's Duty to Cooperate with neighbouring authorities.
- The signed Duty to Cooperate Statement of Common Ground (DtC SoCG) between Shropshire and the Black County Authorities (EV41) (June 2021) identified an unmet housing need from the Black Country Area of 28,239 dwellings to 2039. On this basis, LVA strongly urge the Council to accommodate more of the Black Country's unmet housing need and increase the Plan's housing requirement accordingly. This is supported by the PPG¹ which identifies the requirement to meet unmet housing need as an appropriate circumstance to plan for a housing need figure than the standard method indicates.

¹ Paragraph: 010 Reference ID: 2a-010-20201216

Identification of Reasonable Options for the Housing Requirement

2.4 Paragraph 8.8 identifies three reasonable alternatives that the Council have considered to determine the Plan's housing requirement that were assessed within this updated additional SA assessment work. These reasonable options are:

- a) **Housing Requirement Option 1a: Moderate Growth** - Consisting of around a 5% uplift on the identified 2020 baseline local housing need. This option would result in a housing requirement of 27,200 dwellings over the plan period (which equates to around 1,236 dwellings as an annual average).
- b) **Housing Requirement Option 1b: Moderate Growth plus a Contribution to the Black Country Authorities Unmet Housing Needs** - Consisting of around a 5% uplift on the identified 2020 baseline local housing need, plus a further specific uplift of 1,500 dwellings as a contribution to the unmet housing need forecast to arise in the Black Country. This option would result in a housing requirement of 28,700 dwellings over the plan period (which equates to around 1,305 dwellings as an annual average).
- c) **Housing Requirement Option 2a: Significant Growth** - Consisting of around a 10% uplift on the identified 2020 baseline local housing need. This option would result in a housing requirement of 28,500 dwellings over the plan period (which equates to around 1,296 dwellings as an annual average).
- d) **Housing Requirement Option 2b: Significant Growth plus a Contribution to the Black Country Authorities Unmet Housing Needs** - Consisting of around a 10% uplift on the identified 2020 baseline local housing need, plus a further specific uplift of 1,500 dwellings as a contribution to the unmet housing need forecast to arise in the Black Country. This option would result in a housing requirement of 30,000 dwellings over the plan period (which equates to around 1,364 dwellings as an annual average).
- e) **Housing Requirement Option 3a: High Growth** - Consisting of around a 15% uplift on the identified 2020 baseline local housing need. This option would result in a housing requirement of 29,800 dwellings over the plan period (which equates to around 1,355 dwellings as an annual average).
- f) **Housing Requirement Option 3b: High Growth plus a Contribution to the Black Country Authorities Unmet Housing Needs** - Consisting of around a 15% uplift on the identified 2020 baseline local housing need, plus a further specific uplift of 1,500 dwellings as a contribution to the unmet housing need forecast to arise in the Black Country. This option would result in a housing requirement of 31,300 dwellings over the plan period (which equates to around 1,423 dwellings as an annual average).

2.5 LVA support the Council's findings within paragraph 8.90 and consider that Housing Requirement Option 3b: 'High Growth plus a Contribution to the Black Country Authorities Unmet Housing Needs' is the most sustainable option to meet the anticipated levels of housing growth for Shropshire and the Black Country throughout the plan period.

2.6 The Council following has therefore proposed the following in paragraphs 10.3-10.4:

- 10.3 **Option 3b: High Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs** represents around a 15% uplift on local housing need of 25,894 dwellings over the 22-year plan period (annual average of 1,177 dwellings), plus a 1,500 dwelling contribution towards forecast unmet housing need in the Black Country.
- 10.4 The resultant proposed housing requirement is **31,300 dwellings** over the proposed plan period from 2016 – 2038. This equates to an annual average of around 1,423 dwellings.

2.7 LVA support option 3b for the following reasons:

- The Councils priority should be the provision of housing. This should be delivered by market housing and in turn will support the aim of maximising the delivery of affordable housing through Section 106 to respond to the district's demographic, social and economic needs; and
- A greater uplift of housing should be provided beyond Option 3b to ensure that the Local Plan is positively prepared in accordance with paragraph 35 of the NPPF, above and beyond the Government's Standard Method.

Extension to the Plan Period

2.8 Paragraph 22 of the NPPF (2023) states:

“Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to consider the likely timescale for delivery.”

2.9 Paragraph 9.14 confirms the Plan period was extended from 20 years to 22 years covering the Plan Period from 2016 to 2038. However, in order for the Plan to meet the minimum requirements of the NPPF, the Local Plan should have been adopted before the end of 2023 to ensure the minimum 15-year period is covered.

2.10 The Council's Local Development Scheme (June 2023) anticipated that the Local Plan would be adopted by June 2024. However, this timetable has already been subject to delays, and following the conclusion of this consultation on June 11th 2024, additional hearing sessions are anticipated to ensure the additional work undertaken by the Council can be considered

accordingly by Inspectors. It is therefore that the Plan is more likely to be adopted in early 2025.

- 2.11 Furthermore, it is expected that all plan-making in England will be affected by the General Election (which will take place on 4th July 2024) and likely planning reform and national planning policy updates during 2024/25 delaying the preparation of the Shropshire Local Plan further.
- 2.12 On this basis, assuming the Local Plan will be adopted in 2025 at the earliest, LVA would recommend that the plan period be extended by at least 2 years to provide a plan period of 15 years post adoption in accordance with paragraph 22 of the NPPF.
- 2.13 In accordance with option 3b 'High Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs', the updated Standard Methodology figure for the Plan for Shropshire should be 34,146 homes, and with an additional 1,500 homes (as a minimum) contributing to the unmet needs of the Black Country, would total a "minimum" Housing Requirement of 35,646 over the Plan Period to 2040. The draft Housing Requirement, and in turn the Employment Requirement, should therefore be updated accordingly.

Identification of Reasonable Options for Accommodating the Uplift to the Proposed Housing Requirement

- 2.14 Paragraph 10.6 confirms the Council have considered the following mechanisms to ensure the delivery of proposed housing requirement and in particular the proposed uplift to the housing requirement:
- Option 1: Increasing Settlement Guidelines and Windfall Allowances.
 - Option 2: Densification of Proposed Site Allocations.
 - Option 3: Increasing Site Allocations.
 - Option 4: A Combination of Two or More of the Other Options.
- 2.15 Paragraph 10.61 confirms the Council consider that Option 1: increasing settlement guidelines and windfall allowances represents the most sustainable of the reasonable options for accommodating the uplift to the proposed housing requirement.
- 2.16 LVA support option 3 'Increasing Site Allocations' for the following reasons:
- With the proposed increase to the draft Housing Requirement, allocating specific sites for development would bring certainty to the delivery of housing across the plan period.
 - Option 1 would create a reliance on windfall allowances which are not guaranteed throughout the Plan Period.
 - It is imperative that sustainable patterns of development are proposed, and increasing the site allocations within the Local Plan will provide clarity and will give

the Council more control over where development is proposed and distributed throughout Shropshire.

- Increasing site allocations will provide certainty to the Council of anticipated financial contributions and improvements to local infrastructure for each settlement.
- With specific regard to Highley, draft Policy S9: Highley Place Plan Area proposes around 250 dwellings and 3ha of employment development. Whilst the allocated site Land South of Oak Street (HNN016) proposes an allocation of 100 dwellings, in addition to the 150 dwellings anticipated from windfall sites both are not guaranteed to come forward throughout the Plan Period without additional site allocations.
- LVA would like to emphasise that the Stage 3 Assessment with regards to Land South of Oak Street (HNN016) does not confirm that the site has been promoted throughout the Local Plan process and therefore the deliverability of HNN016 has not been confirmed. Without justification and evidence that the site is available, achievable and deliverable it cannot be guaranteed the proposed allocation will come forward within the Local Plan.
- Overall, option 3 provides the most certainty on how development will be distributed and brought forward in Shropshire and is therefore considered the most logical and sustainable.

- 2.17 As presently proposed, the justification for option 1 is not clear nor justified and there should be more evidence to showcase that increasing settlement guidelines and windfall allowances will meet the proposed draft Housing Requirement. We consider that increasing the number of site allocations in the Plan would provide certainty on the provision of housing. Therefore option 1 is not justified and is therefore fails to meet paragraph 35b) of the NPPF.

Identification of Reasonable Options for Any Contribution to the Unmet Employment Land Needs Forecast to Arise in the Black Country

- 2.18 Paragraph 7.8 confirms the following approaches to proposed contributions towards the unmet employment land needs forecast to arise within the Black Country:
- c) Option 1: No contribution towards the unmet employment land needs forecast to arise within the Black Country.
 - d) Option 2: Contribution of 30ha of land towards the unmet employment land needs forecast to arise within the Black Country
- 2.19 Whilst LVA support Option 2 to provide 30ha of land towards the unmet employment land needs to arise within the Black Country as it satisfies the Council's legal Duty to Co-operate and is in accordance with the signed Statement of Common Ground (SoCG) between Shropshire and the Black County Authorities (EV41), LVA consider that as a consequence of the plan period being required to extend to 2040 that the employment land requirement should also be updated.

- 2.20 As detailed within EV41 there is a significant shortfall of employment land ranging between 263ha or 500ha depending on the growth scenario applied within the WMCA SEP. The DtC SoCG also clearly outlines that it is possible there could continue to be a quantitative and qualitative shortfall of employment land in neighbouring areas which could be accommodated within the Plan area. There is a clear request for the draft Shropshire Local Plan to recognise this and the potential that it could act as a key trigger for an early review of the draft Shropshire Local Plan.
- 2.21 Given the delay in adopting the draft Shropshire Local Plan to date and the need to extend the plan period to 2040 the employment provision is increased not just for Shropshire but to accommodate more of the unmet employment needs on the Black Country and to avoid an early review of the Shropshire Local Plan. The Council therefore need to consider what the unmet needs of the Black Country would be if the plan period is extended by 2 years to 2024 and add to the proposed employment land requirement for Shropshire.

Contemporary employment land options for Shropshire

- 2.22 Figure 9.1 details the following contemporary employment land options:

- 1a) Shropshire Productivity Growth
- 1b) Shropshire Productivity Growth with Black Country Contribution
- 2a) Shropshire Significant Growth
- 2b) Shropshire Significant Growth with Black Country Contribution
- 3a) Shropshire High Growth
- 3b) Shropshire High Growth with Black Country Contribution

- 2.23 Paragraph 9.106 confirms the Council consider that option 3b represents the most sustainable option for the level of employment land development identified and should form the basis for the proposed employment land requirement within the draft Shropshire Local Plan as illustrated by paragraphs 11.3 - 11.4 of the SA:

11.3 **Option 3b: High Growth Plus a 30ha Employment Land Contribution to the Black Country Authorities Unmet Housing Needs** represents around a 15% uplift on local employment land need of 250ha over the 22-year plan period (annual average of around 11.5ha), plus a 30ha employment land contribution toward forecast unmet employment land need in the Black Country.

11.4 The resultant proposed employment land requirement is **320ha** over the proposed plan period from 2016 – 2038. This equates to an annual average of around 14.5ha.

- 2.24 LVA supports the Council in adopting Option 3b: High Growth Plus an employment land contribution to the Black Country Authorities Unmet Housing Needs for the following reasons.

- It demonstrates Shropshire Council are meeting the legal DtC set out in Section 33a of the Planning and Compulsory Purchase Act 2004 (as amended) which is further reflected within the signed DtC SoCG (EV041);
- It reflects positively to the geographic proximity and relationship Shropshire has with the Black Country;
- It encourages a strong, responsive and competitive economy in accordance with the economic objective of national policy contained within the NPPF and PPG, by encouraging a strong economy within Shropshire and meeting the unmet needs of the Black Country whilst also scoring positively within the Council's updated Sustainability Appraisal, and
- It will improve the sustainability of Shropshire and the Black Country by enabling employment (and residential development) to be delivered in a sustainable manner thereby promoting sustainable transport options, helping to reduce travel to work distances and potentially reducing climate impacts.

2.25 As previously detailed, and to avoid an unnecessary need for an early review of the emerging Shropshire Local Plan, the Council should increase the employment requirement to reflect changes to the housing requirement for Shropshire together with the unmet housing requirement for the Black Country and increase the employment land contribution for the Black Country now. This will allow for better alignment between the residential and employment requirements from the start of the new Local Plan and in turn reduce the need for an early plan review which has been raised by the Black Country authorities.

2.26 On the basis of the figures provided above this would equate to an annual average of 11.5ha over a 24-year plan period to 2040 plus a minimum of 30ha employment land for the Black Country totalling at least 344ha employment requirements for the new Local Plan period.

Identification of Reasonable Options for Accommodating the Uplift to the Proposed Employment Land Requirement

2.27 Paragraph 11.6 confirms four options have been considered:

- Option 1: Utilising Settlement Guidelines and Windfall Allowances.
- Option 2: Densification of Proposed Site Allocations.
- Option 3: Increasing Site Allocations.
- Option 4: A Combination of Two or More of the Other Options.

2.28 Paragraph 11.60 confirms the Council consider that Option 1: utilising settlement guidelines and windfall allowances represents the most sustainable of the reasonable options for accommodating the uplift to the proposed employment land requirement.

2.29 Whilst LVA understands the rationale behind the Council's preference for Option 1 as it does represent the most sustainable of the options for accommodating the proposed uplift to the proposed employment land requirement as presented within the Updated Sustainability

Appraisal, LVA consider that should the Council increase the employment requirement further as detailed above at paragraph 2.24 that there would be the need for further site allocations.

- 2.30 In that instance, LVA consider the land at off Netherton Lane, Highley a suitable location for additional employment land provision as the overall settlement sustainability conclusion is considered good. Further commentary relating to the suitability of the land at Netherton Lane for employment use is provided in Section 3 of these representations.

Identification of Site(s) to Accommodate Proposed Contributions Towards Unmet Housing and Employment Land Needs Forecast to Arise in the Black Country

- 2.31 Paragraph 12.30 concluded that potential sites to accommodate the proposed contribution of 1,500 dwellings and 30ha of employment land towards the unmet needs forecast to arise within the Black Country should be located within either central or eastern parts of Shropshire. Specifically, within the highlighted Place Plan Areas which include Highley.
- 2.32 LVA agree with paragraph 12.31 and consider that sites in Highley would be able to promote sustainable patterns of development and would also be most likely to meet the needs of the relevant Black Country households.
- 2.33 LVA therefore support the Councils reasonable options for sites to accommodate all or part of the proposed contribution to the unmet housing needs forecast to arise within the Black Country are those in d) sites associated with the settlement of Highley in paragraph 12.38.
- 2.34 LVA also support the Council's reasonable options for sites to accommodate all or part of the proposed contribution to the unmet employment land needs forecast to arise within the Black Country with particular reference to g) Potential strategic settlements/sites within Highley Place Plan Area.
- 2.35 It is noted that paragraph 12.23 confirmed that the majority of people migrating out of Shropshire to the Black Country are moving from eastern and central locations. Specifically, 8.2% to Highley Place Plan Areas.
- 2.36 In light of the above, land off Netherton Road offers the opportunity to deliver an attractive, sustainable residential development set within a network of green spaces and public open space. LVA welcomes further discussions with the Council regarding the site, which would support the Council's aspiration of accommodating proposed contributions towards unmet housing and employment needs within Shropshire and in the Black Country at Highley.

Scope of the Additional SA and Site Assessment Work

- 2.37 Paragraph 12.1 summarises the conclusions of the Stage 2a Housing Site Assessments, which provided the following assessment for land off Netherton Road, Highley under the reference HNN026. Boyer have undertaken a critique of the Council's assessment (set out below and within Section 3 of this Supporting Statement) and prepared comments with regards to the assessment made.

Table 1. Extract of Updated SA for Residential and Strategic Site (Table 12.1).

	SA: Highley	Boyer Commentary
Settlement:	Highley	
Site Ref.	HNN026	
Overall Settlement Sustainability Conclusion	Fair	Good*
Overall Black Country Contribution Sustainability Conclusion	Good	Good*
	SA: Potential Strategic Site	Boyer Commentary
Settlement:	Potential Strategic Site	
Site Ref.	HNN026	
Overall Settlement Sustainability Conclusion	Good	Good*
Overall Black Country Contribution Sustainability Conclusion	Good	Good*

**Please find detailed critiques of the Council's assessments within Section 3 of this Supporting Statement.*

2.38 With regards to employment, the following conclusions of the stage 2a Employment Site Assessments were provided in table 12.2 with regards to HNN026. Boyer have provided commentary on the updated SA with regards to HNN026 below.

Table 2. Extract of Updated SA for Employment (Table 12.1).

	SA: Employment	Boyer Commentary
Settlement:	Potential Strategic Site	
Site Ref.	HNN026	
Overall Settlement Sustainability Conclusion	Good	Good*
Overall Black Country Contribution Sustainability Conclusion	Fair	Good*

**Please find detailed critiques of the Council's assessments within Section 3 of this Supporting Statement.*

Summary of SA Assessment: Reasonable Options for the Strategic Distribution of Development Across Shropshire

2.39 Paragraph 13.11 confirms that three reasonable options for the strategic distribution of planned development were identified and were assessed within this updated additional SA assessment work. These reasonable options are:

- a) Strategic Distribution of Planned Development Option A: Rural Rebalance
- b) Strategic Distribution of Planned Development Option B: Urban Focus
- c) Strategic Distribution of Planned Development Option C: Balanced Growth

- 2.40 The Council confirm within paragraph 13.54 of the SA that they consider option B is the most sustainable of the three options. LVA agrees with the Council that Option B: Urban Focus does result in more positive effects in relation to the SA objectives. However, should further sites be required those sites adjacent to existing settlements should be considered as a priority over rural locations.

Updated Housing and Employment Topic Paper

- 2.41 Paragraph 2.2 of the Updated Housing and Employment Topic Paper ('Topic Paper') confirms the Draft Local Plan proposes a requirement of 25,894 dwellings over the 22-year plan period which LVA believe is too low.
- 2.42 The use of the standard methodology as a starting point is required by Paragraph 61 of the NPPF (2023), which states:

*"61. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory **starting point** for establishing a housing requirement for the area". [Own Emphasis]*

- 2.43 While LVA welcome the use of the Government's Standard Method as acknowledged within paragraph 5.2, this is only the minimum starting point as required by paragraph 61 of the NPPF. In order for the Plan to be positively prepared, the housing requirement should be increased to help address the District's lack of affordable homes, and to help meet the unmet housing needs of the Black Country.
- 2.44 LVA welcome the conclusion in paragraph 2.5 that the most sustainable option for housing is including an additional 1,500 homes to meet the housing needs of the Black Country. This meets Shropshire's Duty to Cooperate constructively, actively and on an ongoing basis with neighbouring authorities in accordance with the legal requirements of the Localism Act (2011) and section 33A of the Planning and Compulsory Purchase Act (2004).
- 2.45 As a starting point for calculating housing needs within Shropshire, the Plan's draft housing requirement of 25,894 dwellings needs to be increased to meet the District's unmet housing needs as detailed within this Supporting Statement.
- 2.46 LVA therefore support Option 3b (High Growth plus a 1,500 dwelling contribution to the unmet housing need forecast to arise in the Black Country) as this is the most sustainable option for growth.

The Proposed Housing Requirement

- 2.47 However, in light of the above, LVA strongly suggest an increase to the proposed Housing Requirement under option 3b for a minimum of 31,300 dwellings between 2016 and 2038.
- 2.48 LVA consider that additional allocations should be included in the draft Local Plan, including land off Netherton Road, to ensure the Local Plan allocates sufficient growth to meet the housing requirement in a manner that is "*genuinely plan-led*" as supported by the NPPF

(2023) and to ensure that a five year supply of deliverable sites can be evidenced in the Draft LP at adoption to support the housing needs of Shropshire, and the Black Country.

Reasonable Options to Accommodate the Proposed 500 Dwelling Uplift to the Housing Requirement

2.49 Four reasonable options for accommodating the uplift were identified in paragraph 2.10 and assessed through the Updated Additional SA. These are:

- a) Option 1: Increasing Settlement Guidelines and Windfall Allowances.
- b) Option 2: Densification of Proposed Site Allocations.
- c) Option 3: Increasing Site Allocations.
- d) Option 4: A Combination of Two or More of the Other Options.

2.50 The SA and Housing and Employment Topic Paper concluded that Option 1: Increasing Settlement Guidelines and Windfall Allowances was the most sustainable option, with the following windfall allowances identified within paragraph 2.12 of the Topic Paper:

- a) Shrewsbury (Strategic Centre): 350 dwelling increase to the proposed housing guideline to some 8,975 dwellings between 2016 and 2038.
- b) Whitchurch (Principal Centre): 75 dwelling increase to the proposed housing guideline to some 1,675 dwellings between 2016 and 2038.
- c) Former Ironbridge Power Station (Strategic Settlement): 75 dwelling increase to the proposed housing guideline to some 1,075 dwellings between 2016 and 2038.

2.51 LVA support option 3 and consider that it is necessary for additional site allocations to be identified to accommodate the proposed uplift in housing numbers for the following reasons:

- Although the Council have identified approximately 500 additional dwellings within the above areas, Windfall sites should not be depended on to provide housing as there is no certainty they can come forward through the plan period.
- Paragraph 72 of the NPPF states that “*Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply*”. Shropshire should therefore be cautious relying on windfall sites as a reliable source of supply throughout the Plan Period.
- Whilst paragraph 8.34 of the Topic Paper confirms that approximately 4,683 windfall dwellings were delivered between 2018 to 2023, allocated sites that have suitable evidence for their delivery within the Plan Period would be more suited.
- With 11,225 dwellings already coming forward within the above settlements between 2016 and 2038, additional dwellings will result in development being centred around specific strategic centres and principal centres. Allocating sites will create a more equal distribution of housing in Shropshire.

- As noted within this supporting statement, with the recommended housing requirement of 35,646, additional dwellings will need to be allocated throughout the plan period to ensure there is a reliable source of housing supply.

Reasonable Options to Accommodate the Proposed 1,500 Dwelling Contribution to the Black Country

- 2.52 The following sites detailed within paragraph 2.14 are proposed to accommodate the 1,500 dwelling contribution to the unmet housing needs of the Black Country:
- a) BRD030 - Tasley Garden Village, Bridgnorth for 600 dwellings;
 - b) SHR060, SHR158 & SHR161 - Land between Mytton Oak Road and Hanwood Road, Shrewsbury for 300 dwellings; and
 - c) IRN001 - Former Ironbridge Power Station for 600 dwelling.
- 2.53 Whilst LVA do not dispute the sites identified above, it is considered that additional housing allocations will be required to meet the suggested housing requirement. This will provide certainty to the Council that the proposed 1,500 homes can be met as a minimum.
- 2.54 The allocation of a) Tasley Garden Village recognises the relationship between Bridgnorth and the Black Country. LVA would like to emphasise that Highley is located within Bridgnorth and is key settlement within the Draft Local Plan. With Highley being located only 15 minutes away from Bridgnorth, the site relates well to the Black Country and is in closer proximity than Dudley or Stourbridge to the east. This illustrates that Highley is a sustainable location for future development as a Key Settlement and allocating additional housing within Highley will support the Council's objective of meeting the unmet needs of Shropshire and the Black Country.
- 2.55 If there is any uncertainty and one of the sites above does not come forward for any reason, or any risk that the quantum allocated cannot be delivered in full, or there are delays to delivery there will be a significant 'gap' in the required housing numbers that will need to be met elsewhere to meet the housing needs of the Black Country.
- 2.56 Land off Netherton Lane provides an opportunity for the provision of up to 320 dwellings plus self build plots, 0.6ha of Employment land (Use Class E), 0.4ha Community use/local Centre which could include a mobility hub and 16.2ha of public open space consisting of amenity and recreational space, sports pitches (1ha), community allotments (0.2ha), orchards, woodland, play facilities (0.2ha – including teens and children), SuDS and swales and ecological mitigation and enhancement.. The site is well-located within the sustainable settlement of Highley and can support Shropshire Council in the delivery of unmet housing needs, as well as unmet housing and employment contributions for the Black Country Unmet Employment Land Need in the Black Country.
- 2.57 The SA and Topic Paper concluded in paragraph 2.21 that Option 2: a 30ha contribution was the most sustainable option for inclusion within the draft Shropshire Local Plan.

2.58 As noted within this Supporting Statement, LVA support Option 2 to provide 30ha of land towards the unmet employment land needs to arise within the Black Country as a minimum. This would bring a variety of benefits to Shropshire and the Black Country, not limited to the following:

- The distribution of employment contributions throughout Shropshire will support the sustainability of settlements, improving access to employment sites and increasing the provision of jobs for local people.
- The increase in employment land will support the development of the economic vitality of Shropshire as a district, as well as the Black Country.
- The provision of additional land to support the unmet needs of the Black Country will support Shropshire in meeting the Duty to Cooperate with neighbouring authorities.

2.59 We therefore consider that the above justifies a higher employment contribution figure to meet the unmet needs of Shropshire and the Black Country which would contribute towards meeting the identified needs. On this basis we consider that the employment contribution for the Black Country should be amended to state 'Option 3: at least a 30ha contribution'.

Strategic Distribution of Development

2.60 The SA and Housing Topic Paper concluded that Option B: Urban Focus was the most sustainable option for the strategic distribution of development out of the following (paragraph 2.34):

- Option A: Rural Rebalance
- Option B: Urban Focus
- Option C: Balanced Growth

2.61 LVA support option B: Urban Focus due to the following reasons:

- Development can utilise the surrounding existing services and community facilities, thus creating a more sustainable option for future growth within Shropshire.
- Option B will support the development of existing settlements within Shropshire, including Key Settlements such as Highley which are sustainable locations for development.
- Balanced growth can lead to higher costs with the requirement to support the creation and development of associated infrastructure and services.
- Development within rural areas can be brought forward on a windfall basis where opportunities arise on a case by case basis.

2.62 In light of this we believe that an urban focus is the most sustainable option for the strategic distribution of development within Shropshire and the Local Plan should be amended accordingly.

Spatial Strategy

- 2.63 Paragraph 2.37 confirms the revised spatial strategy for Shropshire as set out in Policy SP2 includes:
- a) A housing requirement of a minimum of 31,300 dwellings between 2016 and 2038, of which 1,500 dwellings are a contribution towards the unmet housing needs forecast to arise within the Black Country.
 - b) An employment land requirement of a minimum of 320ha between 2016 and 2038, of which 30ha is a contribution towards the unmet employment land needs forecast to arise within the Black Country.
 - c) An urban focussed strategy for the strategic distribution of development, by which development will be focused in the 'urban areas', which consist of Strategic Centre of Shrewsbury, proposed Principal Centres, proposed Key Centres and proposed Strategic Settlements. This will be complemented by appropriate development within Community Hubs and to a lesser extent Community Clusters. Outside these settlements, new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification.
- 2.64 LVA broadly support the key aims of the revised spatial strategy and would like to emphasise the need for the Council to maximise the delivery of affordable housing to respond to Shropshire's demographic, social and economic needs. Land off Netherton Road has the ability to deliver circa 320 homes that would be deliverable within the next five years. Furthermore, this supports the Council in maintaining a 5-year housing land supply and facilitating the necessary type and scale of new homes to respond to the district's social and economic needs.
- 2.65 As noted within the above sections of this Supporting Statement, LVA believe that the Standard Methodology figure for the Plan for Shropshire should be 34,146 homes, with an additional 1,500 homes (as a minimum) contributing to the unmet needs of the Black Country, totalling a Housing Requirement of 35,646 over the Plan Period to 2040.
- 2.66 Similar to the approach to the housing requirement, with regards to employment land, LVA believe that additional land should be added to the proposed employment land requirement for Shropshire to support maximising growth throughout the Plan Period.
- 2.67 The spatial strategy should therefore be updated accordingly to accommodate a higher level of growth within the proposed Housing Requirement and employment land requirement.
- 2.68 Overall LVA support the urban focussed strategy for the strategic distribution of development in Shropshire, with particular emphasis on the provision of development within the 'urban areas' which includes proposed Key Centres such as Highley.

Highley Place Plan Area

- 2.69 Paragraph 16.118 of the Topic Paper confirms that the draft Shropshire Local Plan identifies Highley as a specific location to accommodate development, contributing towards the strategic growth objectives for the east of the County which is strongly supported by LVA.
- 2.70 Whilst it is envisaged that Highley will deliver around 250 dwellings and 3ha of employment land between 2016 and 2038, LVA consider that the provision of dwellings and employment should be increased accordingly.
- 2.71 Despite no potential strategic sites being identified within the Highley Place Plan Area, section 3 of this Supporting Statement illustrates that constraints identified regarding land off Netherton Lane can be mitigated.
- 2.72 Highley is a sustainable location for new housing and should be a focus for new development for the following reasons:
- The provision of additional housing will support the delivery of approximately 7,700 affordable homes over the Draft Local Plan period within Shropshire;
 - Associated infrastructure agreed through an appropriate S106 agreement will support the improvement of sustainable transport links within the area, improving connectivity to surrounding amenities and services (schools, GP surgeries, shops, open space and recreational areas);
 - Meeting the local housing need will create more opportunities for local people to live and work in the area;
 - Highley benefits from a range of existing transport links, including by road, car and various existing walking routes; and
 - The provision of additional employment space within Highley will support the local economy and provide employment opportunities reducing the need to travel by car.

3. LAND OFF NETHERTON LANE, HIGHLEY (REF. HNN026)

- 3.1 Land off Netherton Lane extends to approximately 26.62ha (65.77 acres) in size and comprises several agricultural fields that are bordered by hedgerows that are under the control of LVA. Access is currently available from the western and southern boundary via Netherton Lane, and from the eastern boundary via Silverdale Terrace. The location of the site is illustrated in **Appendix 1** of this Supporting Statement.
- 3.2 The land at Highley is located outside of, but adjacent to, the defined development boundary for Highley within a Rural Regeneration Zone and contains a series of public footpaths that cross the site. It is designated as a Minerals Safeguarding Area for brick clay. The south-eastern boundary of the site is adjacent to the Highley Conservation Area and is located approximately 1.2km west of the Green Belt, 2km south west from the Bush Wood and High Wood SSSI and 9.5km east of the Shropshire Hills National Landscape.
- 3.3 The site would form a logical extension to Highley, integrating well with the existing settlement and would create a defined boundary on the approach from the south. The site is well-located and benefits from being within a 20 minute walk to local amenities and facilities. The location of the site is shown edged in red below.

Figure 1. Land off Netherton Lane, Highley.



Technical Assessments

- 3.4 In addition to the points raised in the previous section and to assist the Local Authority in assessing the deliverability of land off Netherton Lane for residential development, the following technical evidence demonstrates that the Site can be delivered as a sustainable residential urban allocation within the Shropshire Local Plan.
- 3.5 The full documents are provided separately; however, for ease, a summary of the main conclusions for each technical discipline is provided below.

Ecology

- 3.6 A Preliminary Ecological Survey (PES) (**Appendix 4**) has been undertaken by GE Consulting. It confirms that the site is not subject to any nature conservation designations and there are no internationally (European) designated sites within 10km of the site. A single Site of Special Scientific Interest (SSSI) is located within 2km of the site. Bush Wood and High Wood SSSI lies approximately 1.95km west of the site. There are eight non-statutory designated Local Wildlife Sites (LWSs) within 2km of the site, the closest being New England Area LWS c.160m west of the site at its nearest point, designated for notable scrub and ground flora habitats.
- 3.7 The PES confirms:

The site comprises extensive pasture fields (cattle and sheep grazed) intersected and bound by a mixture of defunct and intact species-rich and species-poor hedgerows some containing mature standards. In field mature trees (predominantly oak) are present and a significant tree line runs north south through the south of the site. There are no watercourses on or within close proximity to the site however there are surface water drainage ditches associated with some of the field boundaries that drain to the south. One ditch bisecting fields in the south of the site appears permanently wet due to the presence of emergent and macrophyte vegetation. Two ponds are present in the north of the site which are interconnected by a culverted drainage feature with associated wetland vegetation (Juncus dominated). The ponds are shallow and likely to dry frequently, and both are associated with woodland comprising willow, alder oak and hawthorn. The grassland throughout the Site is fairly uniform with extensive areas of modified grassland. Two isolated areas associated with wetter areas of the Site in the southwest and north west were identified as being of greater botanical diversity comprising Holcus-Juncus neutral grassland.

The habitats supported by the site particularly in association with the wetter areas are considered to be of overall moderate to high ecological value, whilst the large and relatively featureless pasture fields (which form the majority of the site) are considered to be of low ecological value. These fields are identified as offering potential for delivery of landscape scale habitat creation and offer significant opportunities for attainment of Biodiversity Net Gain and delivery of integrated and high-quality blue and green infrastructure. Many of the hedgerows (particularly internal hedgerows) have become degraded over time due to grazing pressures and intensive management through regular flailing. Therefore, there are

significant opportunities for enhancement of hedgerows through gapping up, bolstering with additional native species planting and favourable long-term management.

The site presents opportunities for commuting and foraging bats by virtue of the network of hedgerows, grazed pasture and wetland habitats whilst mature standard trees are likely to afford opportunities for roosting bats. On and offsite ponds offer potentially suitable breeding habitat for great crested newt. Hedgerows and offsite woodland have potential to support a dormouse population and common and widespread reptile species could be supported within areas of long/rough grassland which are largely associated with the wetter and more botanically diverse areas of the site. The site is considered likely to support a reasonable assemblage of breeding birds.

Protected species surveys in respect of bats (commuting/foraging and roosting), breeding birds, dormouse, great crested newt and reptiles will be required in line with best practice guidance to inform suitable mitigation strategies and licencing should this be necessary.”

- 3.8 An Ecological Constraints and Opportunities Plan (**Appendix 5**) has been prepared by GE Consulting that provides a summary of the constraints and opportunities on site and identified that there are significant areas of modified pasture present with an overall low ecological baseline.
- 3.9 In summary the Plan illustrates:
- Hedgerows and associated mature trees will be retained where possible to maintain connectivity and linear features throughout the site, offering potential for nesting farmland bird species whilst pasture offers suitable foraging;
 - There are opportunities to create and enhance existing habitats to achieve Biodiversity Net Gain on site;
 - New habitat creation on site would include a mosaic of linked habitats with associated benefits for biodiversity, including new woodland and scrub, wildflower and marshy grassland, wetland / SuDS features, new tree and orchard planting;
 - There is opportunity to provide foraging resource for bat populations on site;
 - Discreet areas on the site have potential to support common species of reptiles; and
 - Ponds on site could be restored and enhanced, with wetland creation in areas adjacent to these habitats as part of SuDS design.
- 3.10 Subject to the implementation of measures for habitat retention, creation and enhancement, no significant reduction in the ecological interest of the site or its surrounds is likely to arise as a result of its development. The PES concludes that, beyond the normal requirements to avoid impacts on protected species and maintain key elements of the habitat resource of the site and its surrounds, there appear to be no overriding nature conservation constraints that would preclude the development of the site.

Flood Risk and Drainage

- 3.11 A Preliminary Flood and Drainage Appraisal (**Appendix 6**) has been prepared by Sustain Environmental to provide an understanding of the potential development constraints and opportunities and to enable input into a proposed layout.
- 3.12 The appraisal confirms that the site is wholly located within Flood Zone 1 and is therefore at low risk of flooding from fluvial and tidal sources. In addition, risk from surface water flooding across a majority of the land area is very low, with less than 1 in 1000-year chance of occurrence. A surface water flow path has been identified in the western part of the site, which drains along the south western boundary towards and then along the drainage channel, draining into Borle Brook.
- 3.13 With regards to groundwater flood risk, based on the Areas Susceptible to Groundwater (AStGWF) dataset, south Shropshire is generally within the <25% susceptible classification, and therefore at lower risk of groundwater flooding. The SFRA for Shropshire advises that there should be little concern over groundwater flooding in Shropshire.
- 3.14 Based on the location and elevation of the land area when compared to the location of sewers and highway drains, there is not anticipated to be an existing drainage and infrastructure flood risk. There are also no known impounded waters in the vicinity of the land area, and as such no risk from artificial sources of flooding.
- 3.15 A surface water drainage strategy would be incorporated into the proposed layout to manage the surface water runoff from developed areas. Appropriate SuDS features would be used to capture surface water runoff and convey it at a controlled runoff rate to an appropriate discharge receptor.
- 3.16 In summary, this preliminary flood and drainage appraisal concludes that the proposed layout of the land area is appropriate and in keeping with the requirements of Policy CS18 on Sustainable Water Management. A surface water drainage strategy incorporated into the proposed layout would manage the surface water runoff and provide a number of other environmental and community benefits.

Access and Movement

- 3.17 Neil Brant Consulting have prepared an Access and Accessibility Technical Note (TN) (**Appendix 7**) that provides a high level overview of access and accessibility with regards to land off Netherton Lane. In summary, the technical note demonstrates the site is in a sustainable location and delivery of a residential led development would not give rise to any access or local transport issues.
- 3.18 Applying the 20 minute neighbourhood principle from the site area to all amenities and services within Highley, both walk and cycle isochrones have been assessed for the site. The results of the TN confirm that the site is accessible and a range of local amenities and facilities are available within a 20 minute walk of the site (primary and nursery school, medical centre, pharmacy, football club, post office, Co-op, supermarket, library, police station etc.).

- 3.19 There are a number of Public Rights of Way (PRoW) across and connecting to the site, providing connections to the village along the northern and eastern site boundaries and therefore have potential to be integrated into the access strategy for the site.
- 3.20 The nearest bus stops to the Site are located on Netherton Road to the south of the Site and along the B4555 / High Street, with all being located well within the desirable 800m (10 minute) walk distance of the Site.
- 3.21 With regards to access, Netherton Lane currently forms a single carriageway road with the carriageway varying between 4.1m and 4.7m. The overall highway width, i.e. that including the verges, is significantly greater and is typically around c7m, with a few pinch points of c6.7m and other sections in excess of 8.5m. It is evident that sufficient highway land exists to accommodate carriageway widening. There is no insurmountable constraints on the ability to bring Netherton Lane up to an appropriate level of provision for the purposes of vehicular and pedestrian access to development of the site. Off-site improvements are also feasible and would not unduly preclude development from occurring.
- 3.22 Overall, the TN evidences the site is well located in its proximity to amenities and facilities and therefore meets the overarching policy objectives on sustainable travel and plan making.
- 3.23 No road safety issues have been identified that would preclude development of the site or access of it on to Netherton Lane. With off-site highway improvements in place the standard of highway provision would be appropriate to accommodate traffic from the development without adverse traffic impacts.
- 3.24 It is considered unlikely that any significant traffic capacity impacts would occur at the junctions of Netherton Lane with the B4555, or any other local road or junction.
- 3.25 In conclusion, active travel, public transport and vehicular access connections of the Site have been established as feasible and deliverable and significant off-site road safety and capacity traffic impacts are unlikely.

Masterplanning

- 3.26 A Vision Document (**Appendix 2**) including a Constraints and Opportunities Plan and Framework Plan (**Appendix 3**) have been prepared by Pegasus Group. The Vision Document confirms that land off Netherton Lane, Highley will provide:
- Up to 320 dwellings;
 - Up to 0.6ha of Employment land (Use Class E);
 - Up to 0.4ha of Community use/local Centre which could include a mobility hub; and
 - 16.2ha of public open space consisting of amenity and recreational space, sports pitches (1ha), community allotments (0.2ha), orchards, woodland, play facilities (0.2ha – including teens and children), SuDS and swales and ecological mitigation and enhancement.

- 3.27 The Vision for the proposed development at Land off Netherton Lane, will deliver a high-quality landscape and community led scheme serving both new and existing residents. The site design will provide extensive landscape features throughout by enhancing the current ecological features and introducing new 'wetland' basins that nestle within the existing landscape, with embedded healthy living principles throughout the scheme.
- 3.28 The Vision Document details that the site is split into two sections, with one area accessed from the west of Netherton Lane and the other via the south that would provide a priority junction access arrangement. As such, the site could be delivered as part of a phased approach, or as one comprehensive development. To facilitate safe, convenient and suitable non-motorised access routes, the following are proposed:
- Provision of new shared cycleway/footway along the proposed spine road;
 - Enhancement of the existing public right of way network; 0127/38/1, 0127/37/1, 0127/26/1, 0127/37/2;
 - Diversion of 0127/39/1 to provide a more suitable route for residents;
 - Additional permeable routes within residential and open space areas.
- 3.29 The Framework Plan proposes:
- Various land uses including residential, primary frontages along primary streets, important frontages to open space with low density, employment, local centre, public open space and allotments.
 - Primary vehicle accesses are proposed from the northwestern and southern boundary of the site along Netherton Lane, with various internal pedestrian connections.
 - PRow within the site have been diverted and retained to ensure that pedestrian connectivity is a key aspect of the scheme.
 - Proposed landscape buffers, proposed areas of ecology, indicative trees and potential attenuation basins have also been proposed on site creating a landscape led development.
 - A LAP / Natural Area has been included within the proposal as well as a NEAP ensuring that provision of natural play spaces can be provided on site.
- 3.30 Overall, it is clear that the site is capable of providing a high quality, considered scheme that will be sympathetic to the local area and local character of Highley.
- Additional Sustainability Appraisal Report: Appendix 1**
- 3.31 Land off Netherton Road will lead to a high-quality provision of much needed housing on the urban edge of Highley. As demonstrated through these representations and the technical information summarised above, the site should be identified as an allocation within the

Council's Draft Local Plan to support the delivery of homes for Shropshire and meeting the unmet needs of the Black Country.

- 3.32 An assessment of the site was provided within the Updated Stage 2a Housing SA Site Assessment. The overall assessment for the site was considered Overall Settlement Sustainability Conclusion fair, and the overall Black Country Contribution Sustainability Conclusion was considered good with regards to residential development.
- 3.33 Boyer has undertaken a critique of the Council's assessment (set out below) and prepared comments with regards to the assessment made within the Stage 2a scoring. Within this assessment, the Site is evidenced to be available, achievable and suitable for development.

Table 3. Updated Stage 2a: Housing SA Site Assessment for HNN026 with Boyer Commentary and Scoring (Page 337 of the SA).

Criteria	Criteria Description	Stage 2a Score	Boyer Commentary	Boyer Score
Site Ref. HNN026				
1	Site wholly or partly within one or more of the following:			
	Special Area of Conservation	0	Agreed, there are no significant constraints identified within or partly within the site.	0
	Ramsar Site	0		0
	National Nature Reserve	0		0
	Site of Special Scientific Interest	0		0
	Ancient Woodland	0		0
	Wildlife Site	0		0
	Local Nature Reserve	0		0
2	Site boundary within buffer zone of one or more:			
	1km of a Special Area of Conservation	0	It is acknowledged that the Council's Natural Environment and Ecology Map confirms Borle Brook Ancient Wood and the New England Local Wildlife Site is within 250m of the site.	0
	1km of Ramsar Site	0		0
	500m of a National Reserve Site	0		0
	500m of a Site of Special Scientific Interest	0		0
	500m of Ancient woodland	-		-
	250m of a Wildlife Site	-		-
	100m of a Local Nature Reserve	0		0
3	Tree Preservation Order (single or group) within or on site boundary	0		Agreed, there are no TPO's located on site.
4	Site contains one or more (or part) of the following:			
	Children's playground	0	Agreed.	0
	Outdoor sports facility	0		0

	Amenity green space	0		0
	Accessible natural green space (natural / semi-natural green space)	0		0
5	Site boundary within 480m of one or more of the following:			
	Primary School	+	The Highley Medical Centre (Health and Wellbeing Centre) opened April 2024 and is within the 480m boundary. With regards to open space, the interactive map on the Council website illustrates that an additional site of 2ha or more Accessible Natural Greenspace is located approximately 200m to the west of the western boundary.	+
	GP surgery	-		+
	Library (permanent or mobile library stop)	+		+
	Leisure centre	+		+
	Children's playground	+		+
	Outdoor sports facility	+		+
	Amenity green space	-		+
	Accessible natural green space (natural / semi-natural green space)	-		+
6	Site boundary within 480m ³ of a public transport node with a regular service offered during peak travel times	+	Agreed.	+
7	Site wholly or partly on grade 1 or 2 or 3 agricultural land (best & most versatile)	-	It is acknowledged the Natural England Provisional Agricultural Land Classification Map shows the site to be within Grade 3.	-
8	All or part of the site within a Source Protection Zone (groundwater)	0	Agreed.	0
9	All or part of the site is within Flood Zone 2 or 3	0	Agreed.	0
10	Site wholly / partly within an Air Quality Management Area	0	Agreed.	0
11	Site is wholly / partly classified as brownfield or is wholly / partly within an area with a previous industrial or potentially contaminative use	0	Agreed.	0
12	Site would displace an existing waste management operation	0	Agreed.	0
13	Site wholly / partly within / contains any of the following:			
	A World Heritage Site or its buffer zone	0	Agreed. The Historic England interactive map also indicates	0

	A Scheduled Monument	0	there are no Listed Buildings wholly or partly within the site.	0
	A Registered Battlefield	0		0
	A Registered Park or Garden	0		0
	A Conservation Area	0		0
	A Listed Building			0
14	Site boundary within buffer zone of one or more:			
	300m of a World Heritage Site or its buffer zone	0	Agreed.	0
	300m of a Scheduled Monument	0		0
	300m of a Registered Battlefield	0		0
	300m of a Registered Park or Garden	0		0
	300m of a Conservation Area	-	It is acknowledged the site is adjacent to the Highley Conservation Area.	-
	300m of a Listed Building	-	It is acknowledged that the Grade II Listed Church House is 100m from the south eastern boundary.	-
15	Site is wholly / partly classified as very high landscape sensitivity for residential		Agreed.	
	Site is wholly / partly classified as high landscape sensitivity for residential			
	Site is wholly / partly classified as medium low. Medium or medium high landscape sensitivity for residential	0		0
	Site is wholly classified as low landscape sensitivity for residential or site is inside the development boundary			
Overall Score		-2		3
Overall Settlement Sustainability Conclusion*		Fair	The above assessment has illustrated that the site should be considered within the 'Good' range and is a sustainable location for residential development within Highley.	Good

Overall Black Country Contribution Sustainability Conclusion*	Good	Agreed.	Good
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*Highley Settlement Range is 5 to -11, Good is 5 to 0, Fair is -1 to -6, Poor is -7 to -11.

3.37 An assessment of the site was also provided within Appendix 1 of the Sustainability Statement for HNN026 as a Strategic Settlement or Site. The overall assessment for the site was considered good for overall settlement sustainability, and fair with regards to the overall Black Country contribution.

3.38 Boyer has undertaken a critique of the Council's assessment (set out below) and prepared comments with regards to the assessment made.

Table 4. Updated Stage 2a: Strategic Settlement or Site SA Site Assessment for HNN026 with Boyer Commentary and Scoring (Page 356 of SA).

Criteria	Criteria Description	Stage 2a Score	Boyer Commentary	Boyer Score
Strategic Settlement or Site. Site Ref. HNN026				
1	Site wholly or partly within one or more of the following:			
	Special Area of Conservation	0	Agreed.	0
	Ramsar Site	0		0
	National Nature Reserve	0		0
	Site of Special Scientific Interest	0		0
	Ancient Woodland	0		0
	Wildlife Site	0		0
	Local Nature Reserve	0		0
2	Site boundary within buffer zone of one or more:			
	1km of a Special Area of Conservation	0	It is acknowledged that the Council's Natural Environment and Ecology Map confirms Borle Brook Ancient Wood and the New England Local Wildlife Site is within 250m of the site.	0
	1km of Ramsar Site	0		0
	500m of a National Reserve Site	0		0
	500m of a Site of Special Scientific Interest	0		0
	500m of Ancient woodland	-		-
	250m of a Wildlife Site	-		-
	100m of a Local Nature Reserve	0		0
3	Tree Preservation Order (single or group) within or on site boundary	0	Agreed.	0

4	Site contains one or more (or part) of the following:			
	Children's playground	0	Agreed.	0
	Outdoor sports facility	0		0
	Amenity green space	0		0
	Accessible natural green space (natural / semi-natural green space)	0		0
0				
5	Site boundary within 480m of one or more of the following:			
	Primary School	+	The Highley Medical Centre (Health and Wellbeing Centre) opened April 2024 and is within the 480m boundary.	+
	GP surgery	-		+
	Library (permanent or mobile library stop)	+		+
	Leisure centre	+		+
	Children's playground	+		With regards to open space, the interactive map on the Council website illustrates that an additional site of 2ha or more Accessible Natural Greenspace is located approximately 200m to the west of the western boundary.
	Outdoor sports facility	+	+	
	Amenity green space	-	+	
	Accessible natural green space (natural / semi-natural green space)	-	+	
6	Site boundary within 480m of a public transport node with a regular service offered during peak travel times	+	Agreed.	+
7	Site wholly or partly on grade 1 or 2 or 3 agricultural land (best & most versatile)	-	It is acknowledged the Natural England Provisional Agricultural Land Classification Map shows the site within Grade 3.	-
8	All or part of the site within a Source Protection Zone (groundwater)	0	Agreed.	0
9	All or part of the site is within Flood Zone 2 or 3	0	Agreed.	0
10	Site wholly / partly within an Air Quality Management Area	0	Agreed.	0
11	Site is wholly / partly classified as brownfield or is wholly / partly within an area with a previous industrial or potentially contaminative use	0	Agreed.	0
12	Site would displace an existing waste management operation	0	Agreed.	0

13	Site wholly / partly within / contains any of the following:			
	A World Heritage Site or its buffer zone	0	Agreed. The Historic England interactive map also indicates there are no Listed Buildings wholly or partly within the site	0
	A Scheduled Monument	0		0
	A Registered Battlefield	0		0
	A Registered Park or Garden	0		0
	A Conservation Area	0		0
	A Listed Building			0
14	Site boundary within buffer zone of one or more:			
	300m of a World Heritage Site or its buffer zone	0	Agreed.	0
	300m of a Scheduled Monument	0		0
	300m of a Registered Battlefield	0		0
	300m of a Registered Park or Garden	0		0
	300m of a Conservation Area	-	It is acknowledged the site is adjacent to the Highley Conservation Area.	-
	300m of a Listed Building	-	It is acknowledged that a Grade II Listed Church House is 100m from the south eastern boundary.	-
15	Site is wholly / partly classified as very high landscape sensitivity for employment		Agreed.	
	Site is wholly / partly classified as high landscape sensitivity for employment			
	Site is wholly / partly classified as medium low. Medium or medium high landscape sensitivity for employment	0		0
	Site is wholly classified as low landscape sensitivity for employment or site is inside the development boundary			
Overall Score		-2		3
Overall Settlement Sustainability Conclusion*		Good	Agreed.	Good

Overall Black Country Contribution Sustainability Conclusion*	Good	Agreed.	Good
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*Strategic Settlements/Strategic Sites Range 0 to -19, Good is 0 to -6, Fair is -7 to -13, Poor is -14 to -19.

Settlements and Strategic Settlements/Sites within scope for the Black Country Contribution Range is 6 to -19, Good is 6 to -2, Fair is -3 to -11, Poor is -12 to -19.

Additional Sustainability Appraisal Report: Appendix 2

- 3.43 An assessment of the site was provided within Appendix 2 of the SA: Updated Stage 2a Employment SA Site Assessment. The overall assessment for the site was considered good for overall settlement sustainability, and fair with regards to the overall Black Country contribution.
- 3.44 Boyer has undertaken a critique of the Council's assessment (set out below) and prepared comments with regards to the assessment made within the Stage 2a scoring.

Table 5. Updated Stage 2a: Employment SA Site Assessment for HNN026 with Boyer Commentary and Scoring (Page 387 of SA).

Criteria	Criteria Description	Stage 2a Score	Boyer Commentary	Boyer Score
Strategic Settlement or Site. Site Ref. HNN026				
1	Site wholly or partly within one or more of the following:			
	Special Area of Conservation	0	Agreed.	0
	Ramsar Site	0		0
	National Nature Reserve	0		0
	Site of Special Scientific Interest	0		0
	Ancient Woodland	0		0
	Wildlife Site	0		0
	Local Nature Reserve	0		0
2	Site boundary within buffer zone of one or more:			
	1km of a Special Area of Conservation	0	It is acknowledged that the Council's Natural Environment and Ecology Map confirms Borle Brook Ancient Wood and the New England Local Wildlife Site is within 250m of the site.	0
	1km of Ramsar Site	0		0
	500m of a National Reserve Site	0		0
	500m of a Site of Special Scientific Interest	0		0
	500m of Ancient woodland	-		-
	250m of a Wildlife Site	-		-
	100m of a Local Nature Reserve	0		0

3	Tree Preservation Order (single or group) within or on site boundary	0	Agreed.	0
4	Site contains one or more (or part) of the following:			
	Children's playground	0	Agreed.	0
	Outdoor sports facility	0		0
	Amenity green space	0		0
	Accessible natural green space (natural / semi-natural green space)	0		0
5	Site boundary within 480m of one or more of the following:			
	Primary School	+	The Highley Medical Centre (Health and Wellbeing Centre) opened April 2024 and is within the 480m boundary. With regards to open space, the interactive map on the Council website illustrates that an additional site of 2ha or more Accessible Natural Greenspace is located approximately 200m to the west of the western boundary.	+
	GP surgery	-		+
	Leisure centre	+		+
	Outdoor sports facility	+		+
	Amenity green space	-		+
	Accessible natural green space (natural / semi-natural green space)	-		+
6	Site boundary within 480m of a public transport node with a regular service offered during peak travel times	+	Agreed.	+
7	Site wholly or partly on grade 1 or 2 or 3 agricultural land (best & most versatile)	-	It is acknowledged the Natural England Provisional Agricultural Land Classification Map shows the site within Grade 3.	-
8	All or part of the site within a Source Protection Zone (groundwater)	0	Agreed.	0
9	All or part of the site is within Flood Zone 2 or 3	0	Agreed.	0
10	Site wholly / partly within an Air Quality Management Area	0	Agreed.	0
11	Site is wholly / partly classified as brownfield or is wholly / partly within an area	0	Agreed.	0

	with a previous industrial or potentially contaminative use			
12	Site would displace an existing waste management operation	0	Agreed.	0
13	Site wholly / partly within / contains any of the following:			
	A World Heritage Site or its buffer zone	0	Agreed. The Historic England interactive map also indicates there are no Listed Buildings wholly or partly within the site	0
	A Scheduled Monument	0		0
	A Registered Battlefield	0		0
	A Registered Park or Garden	0		0
	A Conservation Area	0		0
	A Listed Building			0
14	Site boundary within buffer zone of one or more:			
	300m of a World Heritage Site or its buffer zone	0	Agreed.	0
	300m of a Scheduled Monument	0		0
	300m of a Registered Battlefield	0		0
	300m of a Registered Park or Garden	0		0
	300m of a Conservation Area	-	It is acknowledged the site is adjacent to the Highley Conservation Area.	-
	300m of a Listed Building	-	It is acknowledged that a Grade II Listed Church House is 100m from the south eastern boundary.	-
15	Site is wholly / partly classified as very high landscape sensitivity for employment		Agreed.	
	Site is wholly / partly classified as high landscape sensitivity for employment			
	Site is wholly / partly classified as medium low. Medium or medium high landscape sensitivity for employment	0		0
	Site is wholly classified as low landscape sensitivity for			

	employment or site is inside the development boundary		
Overall Score	-4		2
Overall Settlement Sustainability Conclusion*	Good	Agreed.	Good
Overall Black Country Contribution Sustainability Conclusion*	Fair	The above assessment has illustrated that the site should be considered within the 'Good' range and is a sustainable location for contributing to the housing needs of the Black Country.	Good

*Strategic Settlements/Strategic Sites Range 0 to -19, Good is 0 to -6, Fair is -7 to -13, Poor is -14 to -19.

Settlements and Strategic Settlements/Sites within scope for the Black Country Contribution Range is 6 to -19, Good is 6 to -2, Fair is -3 to -11, Poor is -12 to -19.

Highley Place Plan Area Stage 2b Screening of Sites: Site Assessments

3.49 Following the above Stage 2a assessment, Boyer have undertaken a critique of the Stage 2b assessment which is detailed below.

Table 6. Site Assessment – Stage 2b Land to the South West of Highley (HNN026).

	Stage 2b Assessment	Boyer Comments
Site Reference:	HNN026	
Site Address:	Land to the South West of Highley	
Settlement:	Highley	
Site Size (ha):	26.62	
Indicative Capacity (Dwellings):	799	Up to 320 dwellings, 0.6ha employment land, 0.4ha of Community use/local Centre which could include a mobility hub, 16.2ha public open space and recreational space, sports pitches (1ha), community allotments (0.2ha), orchards, woodlands, play facilities (0.2ha – including teens and children) SuDs and swales and ecological mitigation and enhancement.
Type of Site:	Greenfield	Agreed.
If mixed, percentage brownfield:	N/A	N/A

General Description:	Pasture land consisting of a number of relatively flat grass fields separated by small hedges with mature trees. The site contains a small pond. Ground slopes gradually from Netherton Lane up to edge of village to the east. The site is fairly open with views to the village.	Agreed.
Surrounding Character:	Land to the west is predominantly agricultural in character. Land to the north consists of a new residential development. Land to the east is a mix of residential development and a couple of small agricultural fields. Land to the south is a mix of agricultural and commercial.	Agreed.
Suitability Information (From SLAA):	N/A	N/A
Availability Information:	Currently available.	Agreed, the site is available and under the control of LVA.
Achievability / Viability Information:	Residential development is generally considered achievable and viable unless there are site specific issues evident. To confirm this conclusion, a viability assessment will be undertaken to inform the Local Plan Review.	Residential development is considered to be achievable and viable on site and no significant constraints have been identified.
Conclusion:		The site is considered to be suitable, available, achievable and viable for residential development.
Availability		The site is available and in the control of LVA.
Size		26.62ha
Strategic Suitability:	The site was promoted following the conclusion of the SLAA.	The site has historically been promoted and is suitable for development.

Summary:	Considered within the next stage of the site assessment process due to conclusions reached regarding the sites availability, size and/or suitability.	The site offers an opportunity to deliver circa 320 homes towards meeting Shropshire's housing needs over the next 5 years and should be considered as an allocation within this emerging Local Plan.
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Additional Sustainability Appraisal Report: Appendix 6

- 3.50 A final assessment of the site was provided within the Updated Stage 3 Site Assessments. The assessment considered that the site does not have potential for Windfall, nor has the potential to be an allocation and therefore was recommended to remain as open countryside. As a result, the site was not taken forward as an allocation within the Draft Local Plan.
- 3.51 Boyer has undertaken a critique of the Council's assessment (set out below) and prepared comments with regards to the assessment made within the Stage 3 scoring. This has illustrated that the site has potential for Windfall and has the potential as an allocation to help meet the local housing needs of Shropshire, Highley and the wider Black Country.

Table 7. Updated Stage 3 Site Assessment: Highley Key Centre for HNN026 with Boyer Commentary (Page 757 – 760 of SA).

	Site Assessment – Stage 3	Boyer Commentary
Site Reference	HNN026	
Coal Authority Reference Area	Yes	Yes
Mineral Safeguarding Area	Yes	Yes (Clay – Brickclay)
Wholly or Partly Grade 1, 2 and / or 4 Agricultural Land Quality	Yes	The Natural England Provisional Agricultural Land Classification Map shows the site within Grade 3.
Percentage of site in Flood Zone 3:	0%	Agreed.
Percentage of site in Flood Zone 2:	0%	Agreed.
Percentage of site in Flood Zone 1:	100%	Agreed. The site is wholly within Flood Zone 1 and is therefore at low risk.
Percentage of the site in the 30 year surface flood risk zone:	0%	Agreed.
Percentage of the site in the 100 year surface flood risk zone:	0%	Agreed.
Percentage of the site in the 1,000 year surface flood risk zone:	1%	Agreed.
Percentage of the site identified on the EA Historic Flood Map:	0%	Agreed.
Percentage of site within 20m of a historic flood event:	0%	Agreed.
Percentage of the site within 20m of a detailed river network:	2%	Agreed.
All or part of the site within a Source Protection Zone:	No	Agreed.

Landscape Considerations: (from the LVSS)	Medium-low	TBC.
Visual Impact Considerations: (from the LVSS)	Medium	TBC.
Highway Comments - Direct Access to Highway Network?	Y	Agreed.
Highway Comments - If No Direct Access, Can One Reasonably Be Achieved? And How?	Assumes access via Jubilee Drive. Netherton Lane also possible but no pedestrian provision and limited potential for improvement and localised widening as site does not extend along whole section of Netherton Lane.	<p>The Site has direct frontage on to Netherton Lane along parts of its southern and western boundary extending to a continuous length of 415m to the west and 195m to the south. These lengths provide significant opportunity to form vehicular access within land controlled by LVA.</p> <p>As detailed within the highways TN. It is evident that sufficient highway land exists to accommodate carriageway widening for suitable vehicular and pedestrian provision and therefore there are no insurmountable constraints to delivery access from Netherton Lane.</p>
Highway Comments - Existing Highway Suitable for Traffic Associated with the Development at the Access Point?	N	Agreed, however LVA consider a suitable access can be achieved as set out within this table and detailed within the enclosed highways TN.
Highway Comments - If Existing Highway at Access Point is Not Suitable, Can It Reasonably be Made So?	Given the scale of the site it is unlikely that an access via Jubilee Drive would have sufficient capacity to serve the development. Netherton Lane is very rural in character has no pedestrian provision and limited potential for improvement. Therefore, subject to an assessment of Netherton Lane and implementation of any necessary improvements to the north of the site	Off-site improvements are feasible and would not unduly preclude development from occurring. It is considered that access could be taken to the site from two general locations, the northwest and south, both on to Netherton Lane.

		Off-site highway improvements would consist of formalising the road width and carriageway edges of sections of Netherton Lane so as to provide a consistent and coherent level of provision. That would typically consist of carriageway widening to provide a minimum width of 5.0m, whereby a width of 4.8m allows for a car and HGV to pass, for sections of road from the site access to the B4555. In the event that sufficient highway land was not available at any localised point, a formal shuttle working layout would be introduced.
Highway Comments - Could the Development Occur Without Off-Site Works?	N	Agreed.
Highway Comments - Are Envisaged Off-Site Works Achievable?	See above	Yes, LVA consider the envisaged off-site works detailed above are achievable.
Highways Accessibility Rating (Out Of 24) (Based on Primary School, GP Surgery, Convenience Store & Public Transport Service):	19	Agreed.
Ecology Comments Significant Constraints:		LVA consider there are no significant ecology constraints.
Ecology Comments Other Constraints:	May require botanical survey. Requires EclA and surveys for GCNs (ponds within 500m), bats, dormice, badgers, reptiles and nesting birds.	Agreed.
Ecology Comments Management of Constraints:	Protected and priority species and habitats mitigation and enhancement, retain and enhance mature trees/	Agreed.

	hedgerows/ tree lines and protect adjacent priority habitats. Protect, enhance and restore Env. Network in accordance with CS17 Environmental Networks and MD12.	
Ecology Comments Opportunities:	Use open space provision to provide biodiversity enhancements. Link open space to existing hedgerow systems and Env Network on boundaries.	The provided Vision Document includes a Framework Plan which has been informed by Ecological Opportunities and Constraints. The Framework Plan has sought to deliver biodiversity enhancements with open spaces provided adjacent to existing hedgerows and pocked of green space to deliver Biodiversity Net Gain.
Heritage Comments Significant Constraints:		LVA consider there are no significant heritage constraints.
Heritage Comments Other Constraints:	Site lies adjacent to and within the setting of the Highley Conservation Area. Possible effects on the settings of Grade II* St Mary's Church (NHLE ref. 1188722), together with GII Church House (NHLE ref. 1188730). Site would largely remove the spatial separation between the historic settlements of Highley and Netherton. No known archaeological interest but large size of site suggests it may have some archaeological potential.	Noted. Any future development proposal would be informed by a Heritage Assessment.
Heritage Comments Management of Constraints:	Heritage Assessment required with application (Setting of LBs and CA; archaeological DBA + field evaluation [geophysical survey + trial trenching]).	Agreed.
Heritage Comments Opportunities:		
Tree Comments Significant Constraints:		There are no significant tree constraints.

Tree Comments Other Constraints:	Mature trees and hedgerows around and within site	
Tree Comments Management of Constraints:	Standard BS5837 tree survey / constraints analysis. Arb Impact Assessment, Tree Protection Plan & Arb Method Statement. Utilise strategic approach to landscape design as part of concept and masterplanning of the scheme	Agreed.
Tree Comments Opportunities:	Retain and enhance tree cover within site, as appropriate to deliver net gain for biodiversity. New native woodland creation, as part of a planned network of natural habitats / accessible open space distributed throughout the site.	Agreed as reflected on the enclosed Framework Plan.
Public Protection Comments Significant Constraints:		LVA consider there are no significant public protection constraints.
Public Protection Comments Other Constraints:	Potential noise from the adjacent pen factory. Landfill in the area and gassing issues known to occur. A Phase I Desk Study should be undertaken and submitted to support any application on the site. This should identify any potential contamination issues from historical map information and other sources. Highley is a past mining village and it is not unknown for there to be undocumented contamination in such sites.	<p>A local search has confirmed that the land has not been subject to any contaminated land notices, nor has any outstanding statutory or informal notices issued by the LPA under the Environmental Protection Act 1990 or Control of Pollution Act 1974.</p> <p>The site is in an area designated as having a 1-3% probability of any property within it having RADON above the Action Level of 200 Bq/m³. A Geo Risk review was undertaken that identified mining features, Brit Pits and former coal mining areas identified on the site with historical features also identified.</p> <p>A coal mining (CON29M) assessment has been undertaken which considers the site to be free from coal mining related risk and no action is required with regards to past coal mining. In addition, a combined site solution assessment has been done for contaminated land and flood risk with the site passing for both aspects.</p> <p>LVA agree a Phase I Desk Study would be undertaken to support any future application on the site.</p>

Public Protection Comments Management of Constraints:	Noise assessment BS4142 and mitigation. Contaminated land assessment.	Agreed.
Public Protection Comments Opportunities:		
Settlement Conclusion – Stage 2a Sustainability Appraisal:	Fair.	Good.
Black Country Contribution Conclusion – Stage 2a Sustainability Appraisal:	Good.	Good.
Relationship to the Black Country	The site is located to the south-west of Highley. Highley is located in south-east Shropshire, an area with a functional relationship to the Black Country. Highley is linked to other settlements solely by B-roads with the nearest notable settlement being Bridgnorth around 4.3 miles to the north. From here, the A458 corridor provides links to the Black Country. The nearest railway station to Highley is in Kidderminster. This would likely require some other form of transport to access.	Agreed.
Potential to Accommodate Housing as Part Of Proposed Contribution to Black Country	This site is of a sufficient scale that it could contribute to the unmet development needs forecast to arise within the Black Country, should it be identified as a proposed site allocation. However, the scale and accessibility of Highley means that the settlement would be unlikely to be considered appropriate to accommodate a substantial quantum of the proposed contribution to the unmet housing or employment needs of the Black Country.	LVA agree the site is sufficient scale to contribute to the unmet development needs forecast to arise within the Black Country and is capable of being identified as a proposed site allocation. Whilst it is appreciated Highley is a key district centre, LVA consider it is capable of supporting further growth with the enclosed highways technical note demonstrating that the site is in a sustainable location for residential development to meet both housing and employment needs of the Black Country.

<p>Strategic Considerations:</p>	<p>A very large site located to the west of Highley, the site adjoins the built form of the settlement to the north, but is separated in part to the east by other agricultural fields. The site also adjoins built form to the south. The site could either be accessed via Jubilee Drive (subject to land ownership) or via Netherton Lane. Given the scale of the site it is unlikely that an access via Jubilee Drive would have sufficient capacity to serve the development.</p> <p>Netherton Lane is very rural in character has no pedestrian provision and limited potential for improvement. Any access via Netherton Lane would be subject to an appropriate assessment of its capacity an implementation of any necessary improvements to the north of the site. Given the length and character of the lane north and/or south-east of the site and the fact that the site does not extend along the whole section of Netherton Lane, such improvements would likely involve third party land.</p> <p>Site lies adjacent to and within the setting of the Highley Conservation Area. Possible effects on the settings of Grade II* St Mary's Church and GII Church House. Site would largely remove the spatial separation between the historic settlements of Highley and Netherton.</p> <p>Site may have archaeological interest. The site contains hedgerows and mature trees. The site contains grades 1/2/3 agricultural land. Applying the precautionary</p>	<p>Land off Netherton Lane will provide the following:</p> <ul style="list-style-type: none"> • Up to 320 dwellings plus self build plots, • 0.6ha of Employment land (Use Class E), • 0.4ha Community use/local Centre which could include a mobility hub and • 16.2ha of public open space consisting of amenity and recreational space, sports pitches (1ha), community allotments (0.2ha), orchards, woodland, play facilities (0.2ha – including teens and children), SuDS and swales and ecological mitigation and enhancement.. <p>The site is split into two sections, with one area accessed from the west of Netherton Lane and the other via the south that would provide a priority junction access arrangement. To facilitate safe, convenient and suitable non-motorised access routes, the following works are proposed:</p> <ul style="list-style-type: none"> • Provision of new shared cycleway/footway along the proposed spine road; • Enhancement of the existing public right of way network; 0127/38/1, 0127/37/1, 0127/26/1, 0127/37/2; • Diversion of 0127/39/1 to provide a more suitable route for residents; • Additional permeable routes within residential and open space areas.
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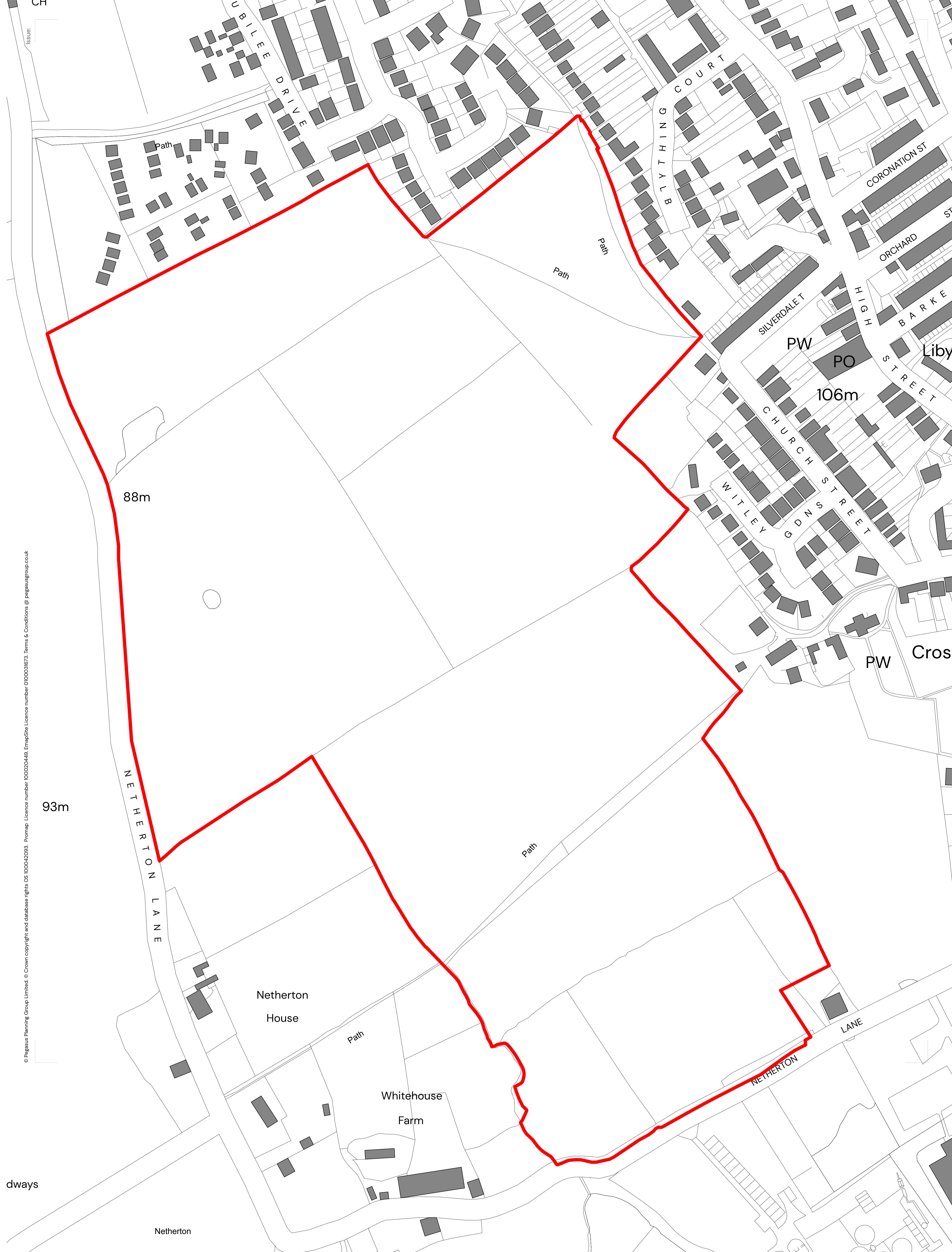
	<p>principle this is considered best and most versatile agricultural land. Site investigation will be required due to historic coal mining/quarrying activities - stability and contamination. The site is some distance from strategic corridors linking to the Black Country and links to these corridors are primarily via B-roads.</p> <p>This site is of a sufficient scale that it could contribute to the unmet development needs forecast to arise within the Black Country, should it be identified as a proposed site allocation. However, the scale and accessibility of Highley means that the settlement would be unlikely to be considered appropriate to accommodate a substantial quantum of the proposed contribution to the unmet housing or employment needs of the Black Country.</p>	<p>Any future development proposal would be subject to a Built Heritage Statement which would assess the impact of residential development adjacent to the existing built edge of Highley and assess possible effects on the conservation area and settings of the Grade II* St Mary's Church and Grade II Church House. Whilst the physical distance between these historic settlements of Highley and Netherton would occur, a sensitively designed scheme would negate effects on the Conservation Area, identified listed buildings and ensure appropriate visual and landscape buffer to ensure spatial separation of the villages remain. A Desk Based Assessment and further site investigation works would be undertaken to assess the archaeological interest at the site and identify the best locations for development.</p> <p>Highley is located within Bridgnorth, the site benefits from good connections to the Black Country and is considered a suitable and sustainable location that can provide housing and employment to meet unmet housing and employment needs within Shropshire and the wider Black Country.</p>
<p>Known Infrastructure Requirements to make Development Suitable in Planning Terms:</p>	<p>Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.</p>	<p>A suite of technical documents has been prepared in addition to this Supporting Statement comprising the following:</p> <ul style="list-style-type: none"> • Vision Document, prepared by Pegasus Design; • Framework Masterplan prepared by Pegasus Design;

		<ul style="list-style-type: none"> • Preliminary Ecological Survey prepared by GE Consulting; • Ecological Constraints and Opportunities Plan, prepared by GE Consulting; • Preliminary Flood and Drainage Appraisal, prepared by Sustain Environmental; and • Access & Accessibility Technical Note, prepared by Neil Brant Consulting.
Known Infrastructure Opportunities:	Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.	Agreed.
Potential for Windfall?	No	Yes
Potential for Allocation?	No	Yes
Recommendation	Remain as open countryside.	Allocated for residential development.

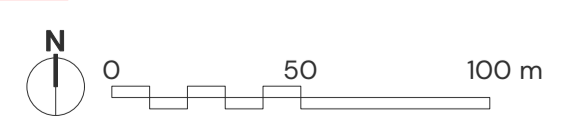
4. SUMMARY

- 4.1 These representations have been prepared by Boyer on behalf of LVA in response to the Shropshire Draft Local Plan Consultation for the promotion of land off Netherton Lane, Highley, Shropshire.
- 4.2 Whilst LVA are broadly in agreement with the conclusions of the Updated SA, there are concerns in relation to certain aspects of the Local Plan, which should be amended through this public consultation. These include:
- The overall housing requirement falls short in meeting the identified housing needs for the district;
 - Option 2 should be undertaken to comply with the LPAS Duty to Cooperate with neighbouring authorities and therefore an additional 1,500 homes should be allocated and included to meet the Black Country's housing needs;
 - Option 3b for growth should be followed, amending the housing requirement to ensure that sufficient housing is delivered during the plan Period to meet the existing unmet housing need which is critical;
 - With regards to Accommodating the Uplift to the Proposed Housing Requirement, Option 3: Increasing Site Allocations should be followed.
- 4.3 In meeting the Council's identified housing needs, LVA recommends the Council consider the allocation of land off Netherton Lane (Ref. HNN026) which can accommodate circa 320 dwellings plus self build plots, 0.6ha of Employment land (Use Class E), 0.4ha Community use/local Centre which could include a mobility hub and 16.2ha of public open space consisting of amenity and recreational space, sports pitches (1ha), community allotments (0.2ha), orchards, woodland, play facilities (0.2ha – including teens and children), SuDS and swales and ecological mitigation and enhancement that could contribute to the Council's short-medium housing land supply. It should be noted that the Site and the proposed scheme is supported by relevant technical evidence, supporting its delivery.
- 4.4 This representation demonstrates that there are no significant constraints to the development of homes at land off Netherton Lane. The land is sustainably located, available now and would be delivered within the first 5 years of the new Local Plan period to support the Council in meeting local housing need and the unmet needs of the Black Country.

APPENDIX 1. SITE LOCATION PLAN



APPLICATION BOUNDARY



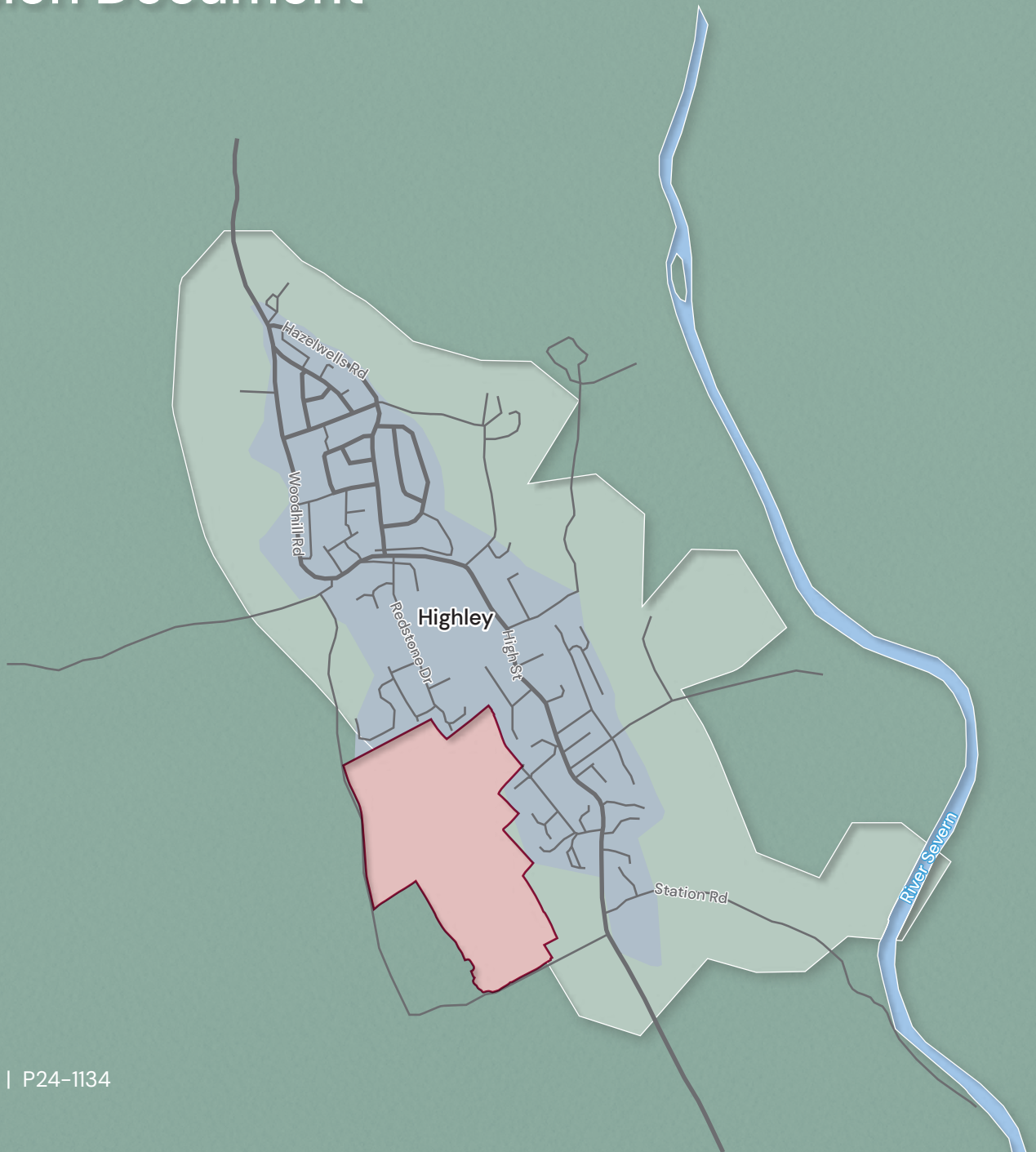
LAND OF NETHERTON LANE, HIGHLEY - Site Location Plan



APPENDIX 2. VISION DOCUMENT

Land off
**Netherton Lane,
Highley, Shropshire**

Vision Document





The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.



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4.0 Design Proposals & Key Benefits	page 22

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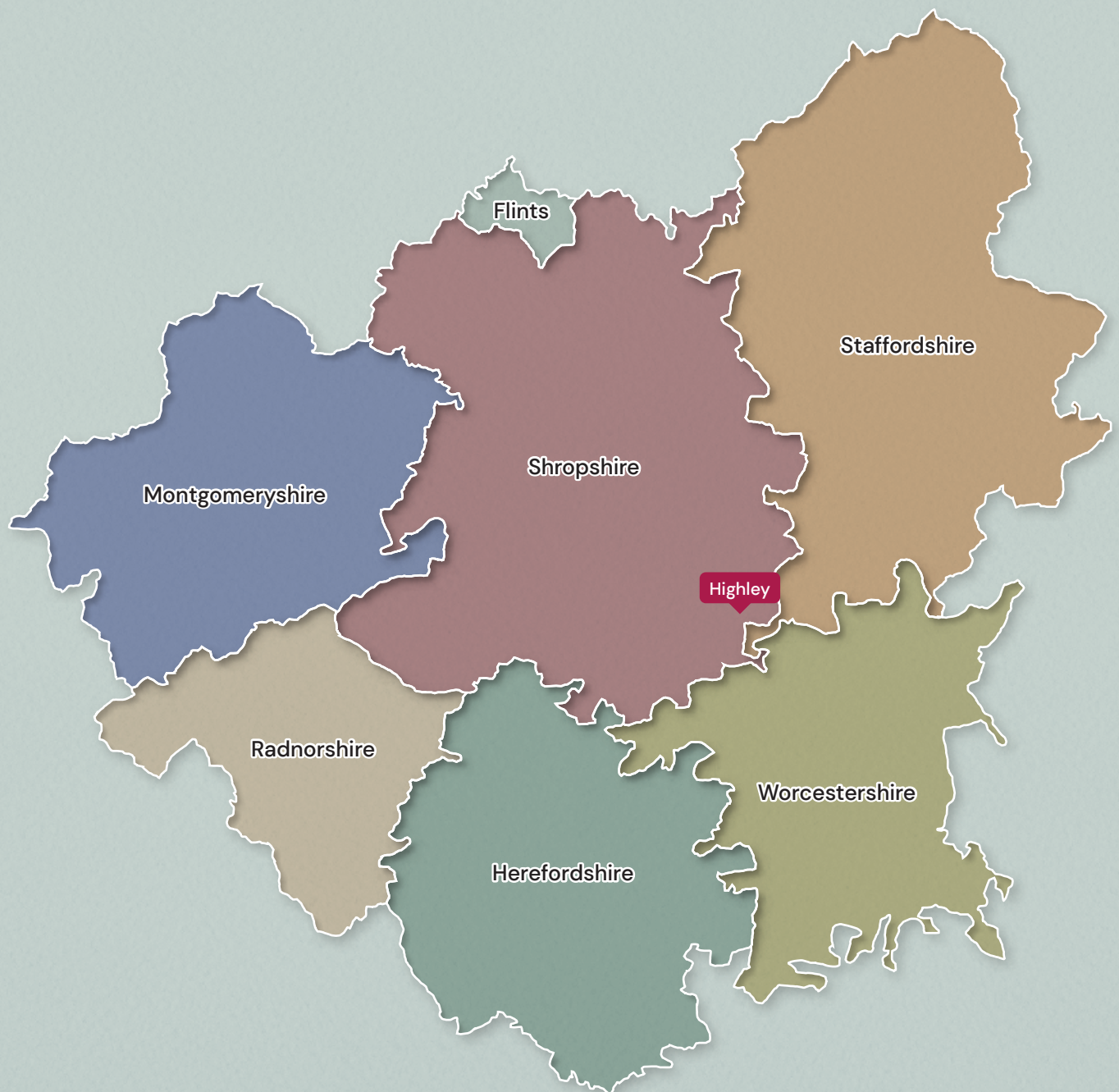
Prepared by
Pegasus Group Ltd

Prepared on behalf of
LVA

June 2024 | P24-1134

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1.0 Introduction & Key Background



1.1 Purpose of the Document

This Vision Document has been prepared in support of development on Land off Netherton Lane, Highley, Shropshire.

The proposals include residential, commercial and community uses alongside an array of public open spaces and green infrastructure within a sustainable location.

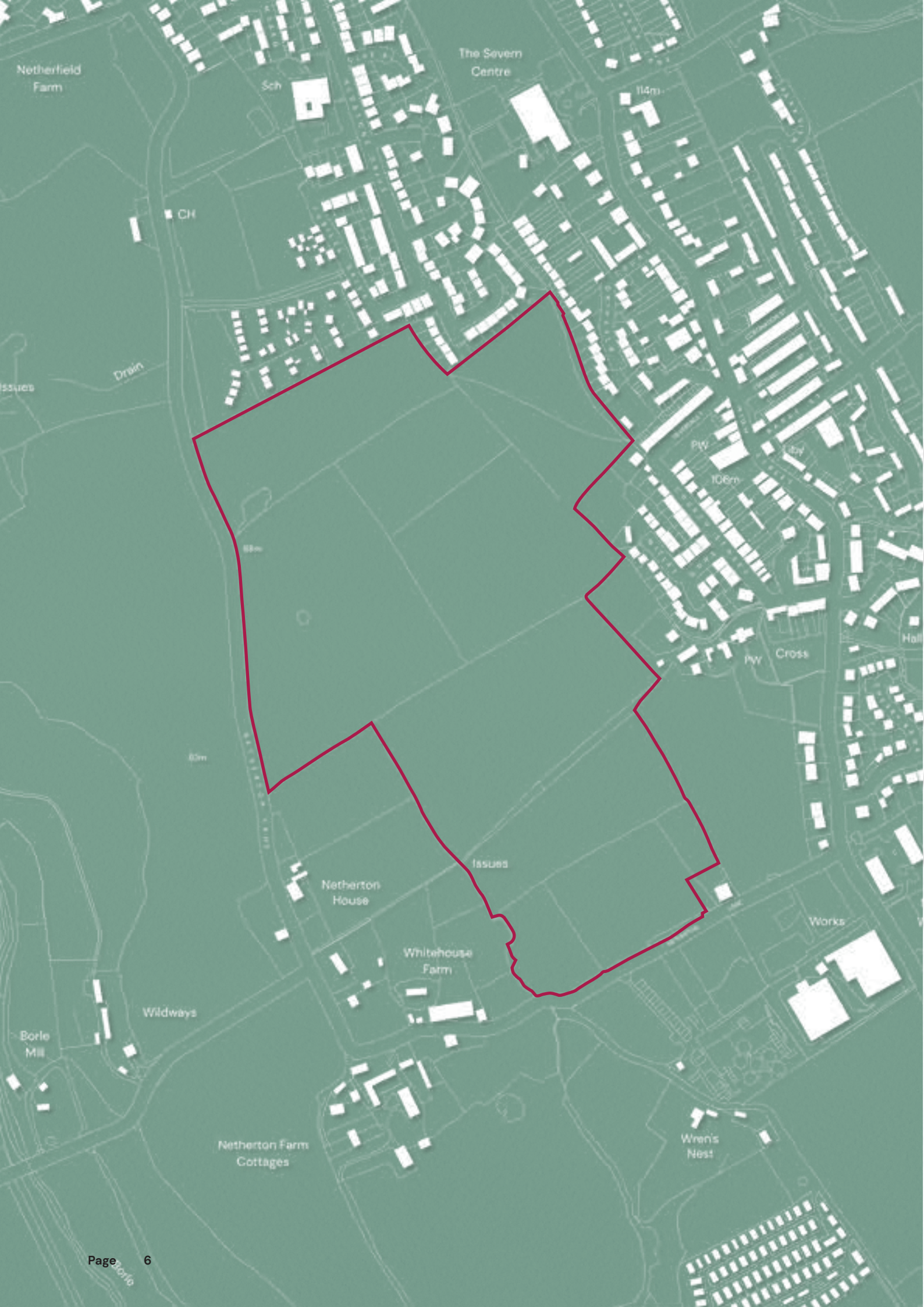
The site falls under the jurisdiction of Shropshire Council and is not currently identified as a draft allocation however this document sets out the vision for the site and how development could be suitably accommodated.

The site offers an excellent opportunity for development on a sustainable site to help address local housing need and under provisions of community uses.

Land off Netherton Lane, Highley provides:

- » Up to 320 dwellings plus self build plots;
- » Up to 0.6ha of Employment land (Use Class E);
- » Up to 0.4ha of Community use/local Centre which could include a mobility hub; and
- » 16.2ha of public open space consisting of amenity and recreational space, sports pitches (1ha), community allotments (0.2ha), orchards, woodland, play facilities (0.2ha – including teens and children) SuDs and swales and ecological mitigation and enhancement.

The site offers the potential to deliver development which is well related to the existing settlement of Highley and offers community uses to assist in its integration. The Vision Document therefore seeks to highlight the deliverability credentials of the land and its location and supports the promotion of the site to seek a future allocation in the Draft Shropshire Local Plan (2016 – 2038).



1.2 Planning Policy

Development Plan

The existing Development Plan relevant to the site comprises the Core Strategy DPD (February 2011) and the Site Allocations and Management of the Development (SAMDev) Plan (December 2015).

The land at Highley is located outside of, but adjacent to, the defined development boundary for Highley within a Rural Regeneration Zone and contains a series of public footpaths that cross the site. It is designated as a Minerals Safeguarding Area for brick clay. The south-eastern boundary of the site is adjacent to the Highley Conservation Area and is located approximately 1.2km east of the Green Belt, 2km south west from the Bush Wood and High Wood SSSI and 9.5km east of the Shropshire Hills National Landscape.

The adopted Core Strategy covers the plan period to 2026. It sets the spatial vision and development strategy for Shropshire. Specifically, Highley is located within Eastern Shropshire and is identified as a key district centre.

The Emerging Development Plan

The land at Highley currently remains being shown outside of, but adjacent to, the defined development boundary.

The emerging Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038 is intending to cover a new plan period to 2038.

Policy SP2 sets out the strategic approach with the intention to deliver 30,800 new dwellings and around 300 hectares of employment land within the new plan period with Highley retained as a key centre.

The latest additional consultation seeks to revise the spatial strategy for the level and distribution across Shropshire. The increased housing and employment provision to be included under emerging Policy SP2 seeks to include the requirement of 31,300 dwellings and 320ha of employment land between 2016 and 2038. Both of these requirements reflects a contribution towards the unmet housing and employment land needs within the Black Country.

Sustainability Appraisal

Throughout the plan making process, the site has been assessed for residential and employment use within the Council's Sustainability Appraisal.

The summary of conclusions for the Stage 2a Housing Site Assessment and Employment Site Assessments identified the following scores for the site (Ref. HNN026)

1.3 Site Context

Highley is a large village in Shropshire, situated north of Netherton and south of Bridgnorth, the village is directly to the west of the Severn Valley Country Park and the River Severn and is served by the B4555.

Highley High Street bisects the village which is predominantly situated within the conservation area, with a number of listed buildings such as the Church of St Mary's and its associated church house. Highley station (0.8km south east of the site) is also a key heritage visitor attraction, home to the Severn Valley Railway and the Engine House Visitor Centre.

The application boundary for Land off Netherton Lane, Highley equates to 26.8ha and is located to the south west of Highley. The site lies outside but adjoining the existing settlement boundary, and is outside of the Conservation Area..

According to the Environment Agency flood map for planning, the entire site is located within flood zone 1, an area least at risk of flooding. The site is not affected by any ecological and/or landscape designations but is located approximately 1.2km east of the Green Belt, 2km south west of the Bush Wood and High Wood SSSI and 9.5km east of the Shropshire Hills National Landscape.

The site sits within a wider area that is designated as a Minerals Safeguarding Area for brick clay. Given the mining history of the Highley, only one small shallow brit pit (since backfilled) is noted as being within the northeastern corner of the site.

Gently sloping, the site's topography falls from the north-eastern part of the land area mainly in a south-westerly direction towards the western part of the site.

Current vehicular access is gained via Netherton Lane from the west and south and has a series of public footpaths cross the site linking into a well-connected Public Right of Way and Bridleway network in all directions.

Netherton Lane abuts the western and southern boundaries and existing residential development bounds the site to the east and north. Field trees, hedgerow planting, rural trees and existing on-site ponds occupy the site and along its boundaries, all of which will be enhanced to offer opportunities for biodiversity and habitat creation.



1. Premier Store

2. Coop Food & Post Office

3. Costcutters



4. Highley Pharmacy



5. Bache Arms

6. Skippers Fish Bar

7. Chinese & Indian Take Away



8. Halo Severn Centre
includes: Library, Parish Council,
Leisure Centre



9. Highley Primary School



10. Highley Golf Centre



11. Severn Valley Country Park



Bus Stop



1.4 Vehicle Access

It is considered that access could be taken to the site from two general locations, the northwest and south, both on to Netherton Lane. Both accesses would be delivered via a priority junction access arrangement. Vehicular routes within the site will look to terminate at a central part of the site, minimising potential junction capacity issues and importantly maintains clear non-motorised routes which will promote sustainable travel.

Off-site highway improvements would consist of formalising the road width and carriageway edges of sections of Netherton Lane so as to provide a consistent and coherent level of provision. It is evident that sufficient highway land exists to accommodate such carriageway widening.

In terms of pedestrian connectivity, it is considered that a footway could be constructed within the site and highway verge to provide a connection to the existing pedestrian link at Hitchens Way from the north western site access location, and along Netherton Lane to the existing footway provision on the B4555 from the southern site access location.

Existing traffic volumes on Netherton Lane have been observed to be very light and traffic speeds significantly below the 60mph speed limit. In conjunction with the carriageway works, it would be appropriate to reduce the speed limit on Netherton Lane to 30mph and thereby closer to current vehicle speeds.

Overall, it is considered that there are no insurmountable constraints on the ability bring Netherton Lane up to an appropriate level of provision for the purposes of access to development of the site.



Netherton Lane joining with the existing footway provision on the B4555 (Source: NeilBrant Consulting, Technical Note 1)



Accessibility

The site is located within a 300m walking distance of Highley High Street home to a wide range of everyday services and facilities, including public houses, healthcare facilities, leisure and employment opportunities. Residents will therefore have access to a wide range of services and facilities either on foot or by bicycle along high quality routes.

As part of the development proposals, a retail/community building is proposed in the centre of the site, linking in with the existing public rights of way to serve the existing Highley residents in the east.

As part of the proposed retail/community area, a mobility hub will be provided offering sustainable and convenient transport modes for existing and new residents.

Pedestrian and Cycle Access

- » To facilitate safe, convenient and suitable Non-motorised user routes, it is proposed to provide the following access arrangements;
- » Provision of new shared cycleway/footway along the proposed spine road;
- » Enhancement of the existing public right of way network; O127/38/1, O127/37/1, O127/26/1, O127/37/2;
- » Diversion of O127/39/1 to provide a more suitable route for residents;
- » Additional permeable routes within residential and open space areas;
- » Good existing points of pedestrian access (PRoW) to the site from Redstone Drive to the north and Silverdale Terrace/Church Street to the east that have potential for upgrading so as to provide connections towards the village amenities and facilities.

Bus Access

The nearest bus stops are located along Highley High Street and are accessible via the existing public right of way network. The proposed mobility hub and pedestrian/cycle infrastructure will offer convenient and attractive multi-modal opportunities for existing and new residents within close proximity to all homes.

1.5 Ecology

A Preliminary ecological survey has been undertaken by GE Consulting to inform the masterplan and has noted opportunities for ecological enhancement and retention and concluded that, beyond the normal requirements to avoid impacts on protected species and maintain key elements of the habitat resource of the site and its surrounds, there appear to be no overriding nature conservation constraints that would preclude the development of the site and the overarching ecological objectives for the site are to:

- » Conserve biodiversity in accordance with the mitigation hierarchy (avoid, mitigate, and as a last resort compensate);
- » Demonstrate at least 10% net gain for biodiversity through restoration of existing ecological features and creation of new habitats in locations that contribute to enhancing ecological networks;
- » Provide a long-term strategy for the sensitive management of habitats and species;
- » Provide mitigation for potential impacts to nearby designated sites.

The Masterplan seeks to deliver these objectives by:

- » Retaining and buffering hedgerows and trees where possible, incorporating them into multi-functional green infrastructure;
- » Retaining, buffering and enhancing wetland features including ditches, ponds and areas of greater botanical diversity;
- » Creating and restoring ecological networks, by bolstering retained hedgerows with additional planting and providing dark corridors for nocturnal wildlife;
- » Creating new ponds/wetland areas and providing links between them as part of the SUDS strategy; and
- » Creating areas of scrub which will be allowed to succeed into woodland, generating new opportunities for a variety of species.

1.6 Hydrology

A Preliminary Flood and Drainage Appraisal has been provided by Sustain Environmental in support of the scheme.

Concluding that the proposed development is located within Flood Zone 1, indicating a low risk from fluvial and tidal flooding and is supported by the NPPF advice that a residential-led development is an appropriate land use to include in Flood Zone 1.

Additionally, with a series of proposed SuDs, swales, bioretention, detention basins and possibly rain gardens and permeable paving the site will be able to sufficiently capture surface water run off whilst offering other environmental, ecological and community benefits. This includes improvements to water quality, biodiversity, landscape, amenity and also to recreational pursuits by contributing to the areas of public open space and to providing a well-connected network of green and blue corridors. With reference to Policy CS18, water quality as well as a number of other areas would be enhanced and protected.

Full details can be found within the supporting appraisal.

1.7 Landscape, Visual and Heritage Considerations

The site is not located within any landscape designations. The nearest designations are Borle Brook Wood Ancient woodland located circa 150m to the west of Netherton Lane, Bush Wood and High Wood SSSI is located over 2km beyond.

In terms of visual setting, the site is relatively well contained to the north and east by a combination of existing settlement and layering of tree and hedgerow cover.

To the south there are combinations of open and filtered views from the local setting of highways and public rights of way.

The site's topography gently slopes to the west, with high points in the north east corner so has some possibility of long distance views. Similarly, consideration of long distance glimpsed views of the Shropshire Hills AONB to the west have been considered.

The closest designated assets to the site are the Grade II* Listed St Mary's Church and associated listings; Church House, Churchyard Cross and Highley War Memorial, there are also two Grade II listed dwellings within the Highley Conservation Area.

The Masterplan proposes additional tree and woodland planting, as well as significant green buffers to secure effective mitigation for views from the AONB to the west effectively screening the site and providing a naturalistic buffer to Netherton Lane. The offset and screening also creates a visual and landscaped buffer in the south-west preventing coalescence of Highley and Netherton villages. Appropriate offsets are also included where the site is in close proximity to the Conservation Area.

Overall, the site is not covered by any built heritage or landscape designation that would suggest an increased value or sensitivity to change, and is not covered by any statutory or non-statutory designation that would prohibit its development for residential purposes.

2.0

Opportunities & Constraints

Opportunities

The provision of a substantial quantity of open market and affordable housing in a location within walking distance of local facilities and forms a natural extension to the existing settlement.

Provision of employment uses, community use and a mobility hub.

8ha of Public Open Space consisting of amenity and recreational space, sports pitches, community allotments, orchards, woodland, play facilities (including teens and children) SuDs and swales and ecological mitigation and enhancement.

Capitalise on views within the scheme to the east towards to the AONB.

Highway improvements along Netherton Lane to improve the access to the site.

To provide new sustainable drainage feature (SUDS) which will form an integral part of the developments green infrastructure and be designed to maximise the landscape and biodiversity value.

To capitalise on the pedestrian connections adjoining the site and improving permeability further for new and existing residents.

Enhancement of existing and provision of new wildlife habitats.

Create a more subtle development edge than is currently offered.

Enhancement of the existing biodiversity through green buffers, supplementary planting and habitat creation.

Consideration of the existing tree and hedgerow cover of the site.

Proposed new local retail facilities for the benefit of new and existing residents.

Proposed mobility hub could offer e-car-club provision, EV charging, and micromobility options, offering sustainable, convenient and attractive options for existing and new residents.

Constraints

Preventing coalescence between Highley and Netherton through the use of a landscaped buffer.

Provide visual screening of the development to the west through a tree-planted woodland buffer.

Existing trees and hedgerows to be retained where possible and supplemented with green buffers, with compensatory planting provided where it is necessary to remove vegetation.

Consideration of the existing residents to the north and east.

Consideration and offsets from the Conservation area in the south-east of the site.

Existing ecological areas to be retained, protected and supplemented with planting/ species rich grassland.

Appropriate response needed to density and heights of existing built form.

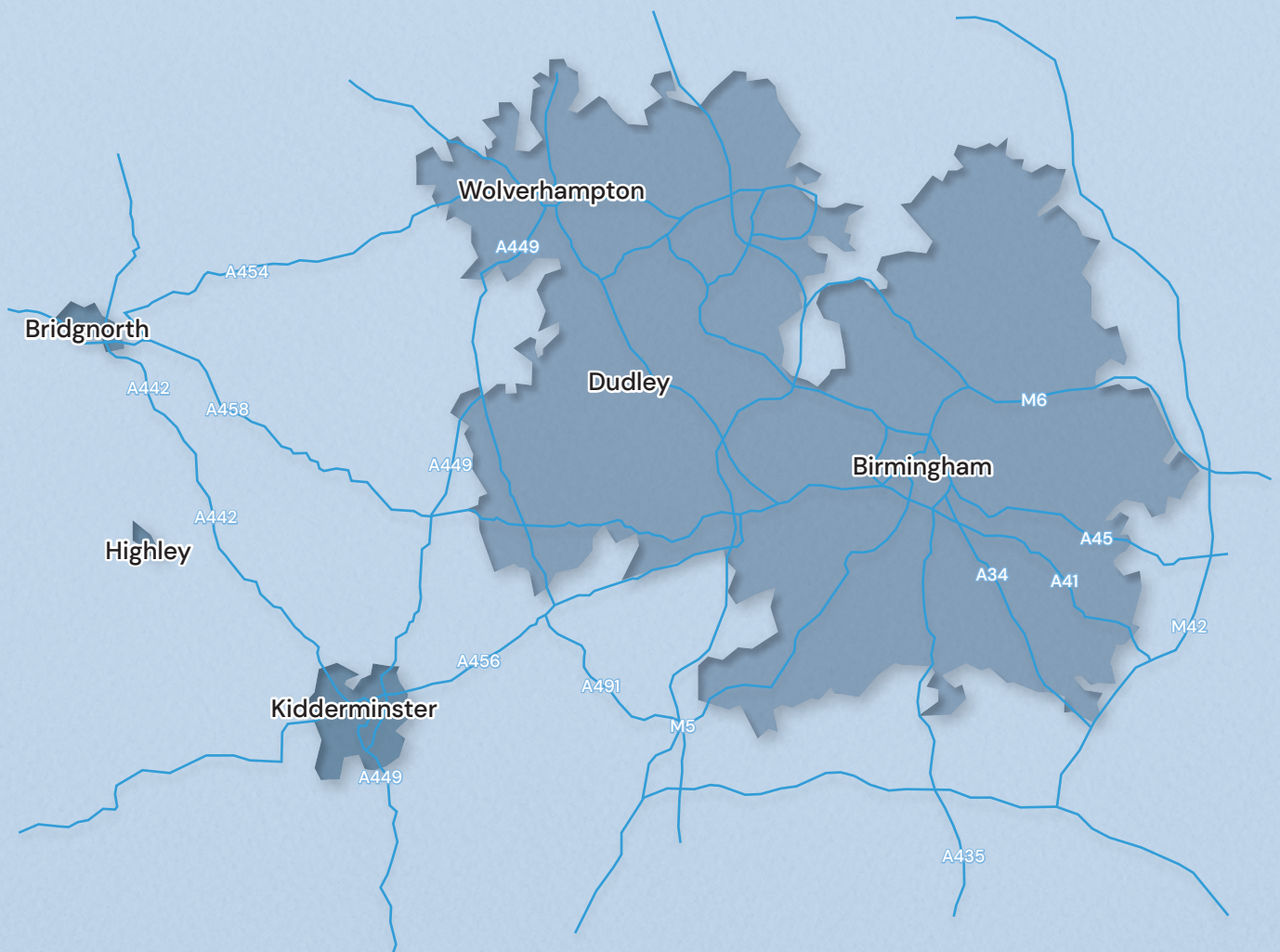
Mitigation of open views to the west through woodland planting on the western boundary.

Creation of an appropriate transition between the settlement and wider setting of farmland to the south.



- KEY: CONSTRAINTS AND OPPORTUNITIES**
- APPLICATION BOUNDARY
- MOVEMENT:**
- PROPOSED VEHICLE ACCESS
 - EXISTING FIELD ACCESS
 - EXISTING HIGHWAY
 - EXISTING HIGHWAY TO BE IMPROVED
 - EXISTING PUBLIC RIGHT OF WAY
 - EXISTING PEDESTRIAN CONNECTION
- ENVIRONMENT:**
- EXISTING TREES AND HEDGEROW (SUBJECT TO TREE SURVEY)
 - FLOOD ZONE 2 (RIVERS AND SEA) (INFO EXTRACTED FROM EA)
 - FLOOD ZONE 3 (RIVERS AND SEA) (INFO EXTRACTED FROM EA)
 - EXISTING STREAM (SUBJECT TO SURVEY)
 - EXISTING UNDERGROUND DITCH (SUBJECT TO SURVEY)
 - POTENTIAL ATTENUATION BASIN
 - POTENTIAL LANDSCAPE BUFFER
 - LANDSCAPE BUFFER TO AREA OF HIGHER VISUAL SENSITIVITY
 - ECOLOGICAL RETENTION AND ENHANCEMENT AREA
 - LANDSCAPE BUFFER TO PREVENT COALESCENCE
 - GLIMPSED VIEWS
 - EXISTING DISUSED 'BRT PIT' subsequently filled in (SUBJECT TO SURVEY)
 - LOW POINT WITHIN SITE
- HERITAGE:**
- CONSERVATION AREA (INFO EXTRACTED FROM HISTORIC ENGLAND)
 - LISTED BUILDING (INFO EXTRACTED FROM HISTORIC ENGLAND)
 - POTENTIAL CONSERVATION AREA BUFFER
 - ANCIENT WOODLAND (INFO EXTRACTED FROM HISTORIC ENGLAND)
- UTILITIES:**
- SEVERN TREAT FOUW SEWER (SUBJECT TO SURVEY) (TO BE DIVERTED)
 - EXISTING SEWERAGE PLAN (POSSIBLE COLOUR RESTRICTIONS/CORDON SANITAIRE)
- ON-SITE:**
- POTENTIAL NOISE CONSTRAINT OF ADJOINING ROADS (SUBJECT TO NOISE SURVEY)
 - DIRECTION OF SLOPE
 - CONTOURS 5M
 - SENSITIVE BUFFER TO EXISTING RESIDENTIAL
- FACILITIES:**
- EXISTING SCHOOL

3.0 Design Principles



3.1 Design Vision

The Vision for Land off Netherton Lane, Highley

The Vision for the proposed development at Land off Netherton Lane, will deliver a high-quality landscape and community led scheme serving both new and existing residents. The site design will provide extensive landscape features throughout by enhancing the current ecological features and introducing new 'wetland' basins that nestle within the existing landscape.

The site will also embed healthy living principles by creating active walking and cycle routes that flow through the development and open spaces. Community facilities including children's play space will give residents of all ages access to a wide range of opportunities for leisure and recreation.

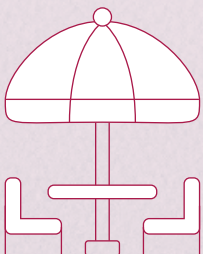
With LVA's wealth of experience and knowledge of bringing forward sustainable development sites across the UK, the site is capable of providing a high quality, considered scheme that will be sympathetic to the local area while being responsive to the local character.



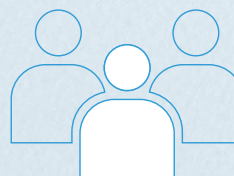
Up to **320 dwellings** plus self build plots.



16.2ha of public open space consisting of amenity and recreational space, sports pitches (1ha), community allotments (0.2ha), orchards, woodland, play facilities (0.2ha – including teens and children) SuDs and swales and ecological mitigation and enhancement.



Up to **0.4ha of Community use/local Centre** which could include a mobility hub;



Up to **0.6ha of Employment land** (Use Class E);

3.2 Design Principles

Following the identification of the constraints and opportunities. The three main design principles of the site comprise; Landscape and Green Infrastructure, Movement & Connectivity, and Community Focus. These have been incorporated within the Concept Masterplan.

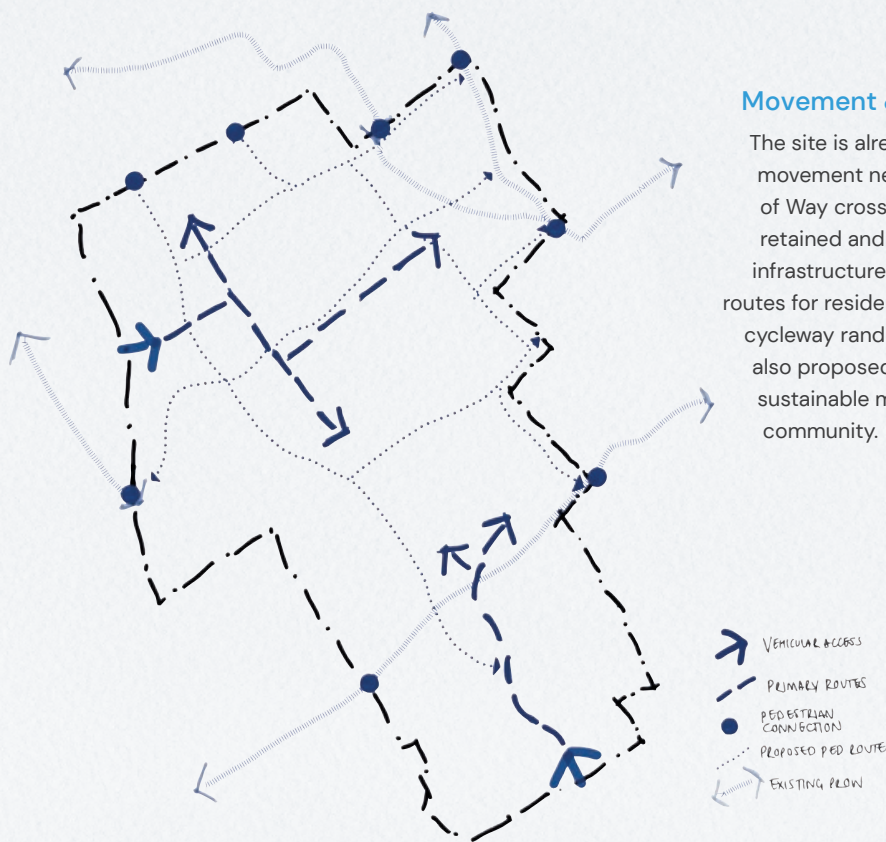
Landscape and Green Infrastructure

The site's existing vegetation will be supplemented by landscaped buffers inclusive of additional planting, as well as natural and amenity green space.

In addition, the western edge which is closest to Netherton will be development free and therefore provides opportunity for woodland planting, to screen the site from the AONB and also prevent coalescence of Highley and Netherton.

The site is subject to a tree survey but the proposals will largely retain all trees and hedgerows, removal will be necessary to facilitate access and movement. These areas have been supplemented with green buffers which are extended in an east-west direction along the entire width of the site, creating ecological buffers and facilitating pedestrian movement. The Masterplan considers the key principles of Building with Nature to ensure that green infrastructure is embedded throughout the scheme.





Movement & Connectivity

The site is already established within the existing movement network with a series of Public Rights of Way crossing the site. These are to be largely retained and enhanced along the proposed green infrastructure grid with additional recreational routes for residents through POS areas. Designated cycleway and Non-Motorised User (NMU) routes are also proposed alongside a mobility hub to promote sustainable methods for the immediate and wider community.

Community Focus

Placement of the community facilities central to the scheme and within close proximity of the existing movement network will assist in integrating the proposed and existing residents. The development incorporates the potential to accommodate an array of uses including a community centre, convenience store, as well as public growing gardens, mobility hub and sports pitch changing rooms as part of an integrated and multi-functional public hub. This is directly linked in an easterly direction to the high street and to the south to incorporate the proposed employment use.





3.3 Building With Nature Framework

Building with Nature (BwN) is a voluntary approach that enables developers and other built environment professionals to go beyond the statutory requirements to deliver high-quality green infrastructure for people and wildlife through each stage of the development process. BwN consists of the following 12 principles;

Core Standards

- Standard 1 Optimises Multifunctionality and Connectivity;
- Standard 2 Positively Responds to the Climate Emergency;
- Standard 3 Maximises Environmental Net Gains;
- Standard 4 Champions a Context Driven Approach;
- Standard 5 Creates Distinctive Places;
- Standard 6 Secures Effective Place-keeping.

Wellbeing Standards

- Standard 7 Brings Nature Closer to People;
- Standard 8 Supports Equitable and Inclusive Places.

Water Standards

- Standard 9 Delivers Climate Resilient Water Management;
- Standard 10 Brings Water Closer to People.

Wildlife Standards

- Standard 11 Delivers Wildlife Enhancement;
- Standard 12 Underpins Nature's Recovery.

Successful schemes which meet the standards can seek formal accreditation via a BwN Award; an external verification of quality that can reassure a wide set of stakeholders that you are committed to the design and delivery of high-quality green infrastructure, at both pre- and post-construction stages. There are two types of BwN Award for physical development:

- BwN Design Award is used to accredit projects at an early stage of design, for example an outline planning application in larger schemes;
- BwN Full Award is used to accredit projects at a more detailed stage of design and includes a post-construction check.

Core Standards

Optimises Multifunctionality and Connectivity

The green infrastructure optimises multifunctionality and connectivity within the boundary of the project and links with existing and planned for green infrastructure in the surrounding area.

Positively Responds to the Climate Emergency

The green infrastructure is designed to be climate resilient by incorporating mitigation and adaptations that respond to the impacts of climate change. The green infrastructure is designed to promote low carbon behaviours and contributes to achieving zero carbon development by optimising carbon sequestration and demonstrating low carbon approaches to design, construction and long-term maintenance.

Maximises Environmental Net Gain

The green infrastructure is designed to actively mitigate any unavoidable harmful environmental impacts of development on soil and air quality and to minimise light and noise pollution. In addition, it delivers environmental net gains, including improving air and water quality and wherever possible includes quiet spaces for people and wildlife.

Champions a Context Driven Approach

The green infrastructure positively responds to the local context, including the physical environment, such as landscape and urban character and social, economic and environmental priorities, including the evidenced needs and strengths of existing and future local communities.

Creates Distinctive Places

The green infrastructure is integral to the project and is designed to reinforce local distinctiveness and/or create a distinctive sense of place.

Secures Effective Place-keeping

The green infrastructure is subject to management arrangements that demonstrate a commitment to effectively implement, establish and maintain features at all stages of the development process. This should include details of funding, governance, maintenance, monitoring, remediation and, where appropriate, community involvement and stewardship.

Wellbeing Standard

Brings Nature Closer to People

The green infrastructure is close to where people live, work, learn, play and/or visit and is designed to optimise use and enjoyment for everyone across the year, to maximise health and wellbeing outcomes and to promote active living for existing and future communities.

Supports Equitable and Inclusive Places

The green infrastructure is designed to encourage and enable everyone, including those from vulnerable or excluded groups, to use and enjoy it, to help reduce health inequalities and to build a shared sense of community and belonging.

Water Standard

Delivers Climate Resilient Water Management

The green infrastructure is integral to sustainable drainage using above ground features to manage flood risk, maintain the natural water cycle and improve water quality within the boundary of the project and at a catchment scale. The green infrastructure is designed to be drought resistant and wherever possible, includes measures for the retention and reuse of rainwater.

Brings Water Closer to People

The green infrastructure is designed to integrate water, including areas of standing water, flowing water, seasonal and ephemeral features, to bring additional amenity and wildlife benefits.

Wildlife Standard

Delivers Wildlife Enhancement

The green infrastructure optimises long term and climate resilient net benefits for nature, by retaining and enhancing existing ecological assets and creating locally relevant new habitats within the boundary of the project. Wildlife measures are secured at all stages of implementation and where applicable, across multiple phases of development.

Underpins Nature's Recovery

The green infrastructure creates effective links with existing and planned for ecological features and networks beyond the boundary of the project to support the creation and restoration of resilient ecological networks in the wider landscape.

4.0 Design Proposals & Key Benefits

Construction Benefits

£70.7million

Estimated construction investment over seven-year build programme ¹

157

Direct construction roles and indirect/induced jobs supported per annum during seven-year build phase

£68.9million ²

Economic output contribution from jobs supported by activities at the site over seven-year (present value) ³ build phase



Operational Benefits

350

Economically active and employed residents estimated to live in the new housing

£1.9million

Estimated first occupation expenditure. (Spending to make a house feel like a 'home') ⁴



117

Gross full-time equivalent jobs supported on-site by the local centre provision



20% affordable homes to be delivered on-site

16.2ha of public open space and play provision to be delivered on-site

Development to aim to deliver in excess of **10% BNG**



48%

Of employed residents estimated to be working in higher value/higher income occupations

£705,171

Estimated annual increase in Council Tax revenue ⁵



£8.6million

Annual household expenditure



¹ Construction cost has been calculated using BCIS Online Tool and are exclusive of external works, contingencies, supporting infrastructure, fees, VAT, finance charges etc. (Accessed: 03/06/2024)
² GVA, or gross value added, is the measure of the value of goods and services produced in an area, sector or industry.
³ Where future benefits are calculated over a ten-year timeframe, they have been discounted to produce a present value.

⁴ Research suggests that the average homeowner spends approximately £5,000 to make their house 'feel like home' within 18-months of moving in (available here: https://www.hbf.co.uk/documents/7876/The_Economic_Footprint_of_UK_House_Building_July_2018LR.pdf). This has been uplifted to £6,000 to account for inflation using the Bank of England Deflator calculator.
⁵ Based on average Council Tax for band D properties in Shropshire of £2,203.66 for 2023/24.





4.1 About LVA

LVA is a leading investor and planning project manager in UK land and property, working responsibly with landowners and all other stakeholders to create developments which add value to their communities.

During the planning process, LVA seeks to undertake constructive consultation with a broad range of stakeholders, aiming to respond to national and local planning policy on energy, sustainability and climate change, whilst balancing the need to overcome any physical constraints of a site.

LVA has decades of experience within the residential and commercial sectors and engages proven professionals from the best-in-class, planning, technical and legal consultants to work with the company on individual projects.

This usually means taking sites through the promotion, examination and application processes to ensure that not only does the right land in the right locations come forward for development, but that the parameters and masterplanning approach to that development can be assured at an early stage in the process.

Through the planning application process, we seek to agree the design principles that set out the core values of a proposed development. These planning conditions that are agreed with the Local Planning Authority control the parameters of development such as the layout, amount of open space, ecological and drainage mitigation measures, and low carbon credentials of the scheme. This gives local communities and the Council the certainty and control required to ensure the scheme is delivered in the right way.

We believe in trying to agree the community benefits which flow from suitable sustainable development. We believe that funding which flows from any S106 or CIL contribution should as far as possible be directed towards the local needs of the people within or connected to the settlement.



Urchfont, Wiltshire (Source: LVA)

No matter the project, no matter the challenge, you can rely on us to find solutions, to get things done, to get things **Expertly Done.**



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APPENDIX 3. FRAMEWORK MASTERPLAN



KEY: FRAMEWORK PLAN	
	APPLICATION BOUNDARY
LAND USE:	
	RESIDENTIAL
	PRIMARY FRONTAGE ALONG PRIMARY STREET
	IMPORTANT FRONTAGE TO OPEN SPACE (LOW DENSITY)
	SELF BUILD AREA (CIRCA 10 PLOTS)
	EMPLOYMENT
	LOCAL CENTRE
	POS
	ALLOTMENTS
MOVEMENT:	
	PROPOSED VEHICLE ACCESS
	PRIMARY STREET
	ROAD NARROWING
	PROPOSED PEDESTRIAN ROUTE
	PROPOSED NORTH-SOUTH PEDESTRIAN/CYCLE CONNECTION
	PROPOSED CYCLEWAY
	PROPOSED PEDESTRIAN CONNECTION
	DIVERTED PUBLIC RIGHT OF WAY
	EXISTING PUBLIC RIGHT OF WAY
	EXISTING PEDESTRIAN CONNECTION
	MOBILITY HUB
	CENTRAL MODAL FILTER
ENVIRONMENT:	
	EXISTING TREES AND HEDGEROW (SUBJECT TO TREE SURVEY)
	PROPOSED LANDSCAPE BUFFER
	PROPOSED AREA OF ECOLOGY
	PROPOSED INDICATIVE TREES
	TREES/SWALES ALONG VERGE
	POTENTIAL ATTENUATION BASINS
	EXISTING DITCH
	PROPOSED SWALE/DITCH
	PLAY (LAP/NATURAL PLAY)
	PLAY (INEAP)

LAND OF NETHERTON LANE, HIGHLEY - FRAMEWORK PLAN



APPENDIX 4. PRELIMINARY ECOLOGICAL SURVEY

Ecological Representations Text

Land at Highley, Shropshire

Preliminary ecological survey work has been undertaken by GE Consulting to identify key constraints and opportunities in relation to the future development of the site.

The site is not subject to any nature conservation designations and there are no internationally (European) designated sites within 10km of the site. A single Site of Special Scientific Interest (SSSI) is located within 2km of the site. Bush Wood and High Wood SSSI lies approximately 1.95km west of the site. There are eight non-statutory designated Local Wildlife Sites (LWSs) within 2km of the site, the closest being New England Area LWS c.160m west of the site at its nearest point, designated for notable scrub and ground flora habitats.


The site comprises extensive pasture fields (cattle and sheep grazed) intersected and bound by a mixture of defunct and intact species-rich and species-poor hedgerows some containing mature standards. In field mature trees (predominantly oak) are present and a significant tree line runs north south through the south of the site. There are no watercourses on or within close proximity to the site however there are surface water drainage ditches associated with some of the field boundaries that drain to the south. One ditch bisecting fields in the south of the site appears permanently wet due to the presence of emergent and macrophyte vegetation. Two ponds are present in the north of the site which are interconnected by a culverted drainage feature with associated wetland vegetation (*Juncus* dominated). The ponds are shallow and likely to dry frequently, and both are associated with woodland comprising willow, alder oak and hawthorn. The grassland throughout the Site is fairly uniform with extensive areas of modified grassland. Two isolated areas associated with wetter areas of the Site in the southwest and north west were identified as being of greater botanical diversity comprising *Holcus-Juncus* neutral grassland.

The habitats supported by the site particularly in association with the wetter areas are considered to be of overall moderate to high ecological value, whilst the large and relatively featureless pasture fields (which form the majority of the site) are considered to be of low ecological value. These fields are identified as offering potential for delivery of landscape scale habitat creation and offer significant opportunities for attainment of Biodiversity Net Gain and delivery of integrated and high-quality blue and green infrastructure. Many of the hedgerows (particularly internal hedgerows) have become degraded over time due to grazing pressures and intensive management through regular flailing. Therefore, there are significant opportunities for enhancement of hedgerows through gapping up, bolstering with additional native species planting and favourable long-term management.

The site presents opportunities for commuting and foraging bats by virtue of the network of hedgerows, grazed pasture and wetland habitats whilst mature standard trees are likely to afford opportunities for roosting bats. On and offsite ponds offer potentially suitable breeding habitat for great crested newt. Hedgerows and offsite woodland have potential to support a dormouse population and common and widespread reptile species could be supported within areas of long/rough grassland which are largely associated with the wetter and more botanically diverse areas of the site. The site is considered likely to support a reasonable assemblage of breeding birds.

Protected species surveys in respect of bats (commuting/foraging and roosting), breeding birds, dormouse, great crested newt and reptiles will be required in line with best practice guidance to inform suitable mitigation strategies and licencing should this be necessary.

The overarching ecological objectives for the site are to:

-  Conserve biodiversity in accordance with the mitigation hierarchy (avoid, mitigate, and as a last resort compensate);



- 👉 Demonstrate at least 10% net gain for biodiversity through restoration of existing ecological features and creation of new habitats in locations that contribute to enhancing ecological networks;
- 👉 Provide a long-term strategy for the sensitive management of habitats and species;
- 👉 Provide mitigation for potential impacts to nearby designated sites.


The Framework Masterplan (Pegasus 2024) seeks to deliver these objectives by:

- 👉 Retaining and buffering hedgerows and trees where possible, incorporating them into multi-functional green infrastructure;
- 👉 Retaining, buffering and enhancing wetland features including ditches, ponds and areas of greater botanical diversity;
- 👉 Creating and restoring ecological networks, by bolstering retained hedgerows with additional planting and providing dark corridors for nocturnal wildlife;
- 👉 Creating new ponds/wetland areas and providing links between them as part of the SUDS strategy;
- 👉 Creating areas of scrub which will be allowed to succeed into woodland, generating new opportunities for a variety of species.

The Framework Masterplan includes significant areas of open space within the west of the Site, comprising a wide variety of habitats including wildflower neutral grassland, significant pond creation and wetland areas, patches of scrub and woodland planting. The creation of these habitats will provide structural diversity and ecotones within areas of the site that are currently subject to fairly intensive agricultural management practices, allowing an array of species to inhabit including some species that may not already be present.

Subject to the implementation of the recommended measures for habitat retention, creation and enhancement, no significant reduction in the ecological interest of the site or its surrounds is likely to arise as a result of its development. It is therefore concluded that, beyond the normal requirements to avoid impacts on protected species and maintain key elements of the habitat resource of the site and its surrounds, there appear to be no overriding nature conservation constraints that would preclude the development of the site.

Appendix 1 – Habitat detail and photographs

Description	Photograph
Modified grassland pasture forming the dominant habitat on the Site	

Description	Photograph
<p>Wet flush dominated by hard rush linking two woodland ponds on site.</p>	
<p>Typical gappy species poor hedgerow forming internal field boundary</p>	
<p>Now defunct gappy hedgerow and substantial mature in field oak trees</p>	

Description	Photograph
Wet ditch with aquatic and marginal vegetation and evidence of poaching	
Field parcel in the south west of the site comprising Holcus-Juncus neutral grassland of greater botanical diversity	



Ponds (including off site ponds within 250m of the site) have potential to support great crested newt and surveys required to establish presence or absence and inform suitable mitigation strategies.

Hedgerows and associated mature standards retained where possible and sensitively managed to maintain connectivity and linear features. Hedgerow buffers required to accommodate dark corridors for light-averse bat species.

Significant areas of modified grassland pasture present an overall low ecological baseline. Opportunities to create and enhance existing habitats to achieve Biodiversity Net Gain.

Ponds on site that could be restored and enhanced for biodiversity through favourable management. Protected during construction with pollution prevention measures and sensitive drainage strategy to ensure potential for impacts are avoided and mitigated. Opportunities for enhancement and wetland creation in areas adjacent to these habitats as part of SuDS design.

New habitat creation to include a mosaic of linked habitats with associated benefits for biodiversity. New habitat creation to include new woodland and scrub, wildflower and marshy grassland, wetland/SuDS features and new tree and orchard planting. Site is capable of delivering 10% uplift in BNG mandated by the Environment Act 2021.

Discreet parcels of wet woodland associated with ponds to be incorporated into site wide strategy for the creation of high-quality linked habitats. Opportunities for enhancement through additional woodland planting to link discreet parcels, successional planting of understorey and suitable long-term management.

Aim to retain mature hedgerows and in field trees including those with potential to support roosting bats.

Grazed pastures with potential to provide foraging resource for bat populations (including rarer light averse Annex II species). Compensatory habitat creation likely to be required.

Discreet areas of high quality marshy grassland (holcus/juncus other neutral grassland) requiring further detailed botanical survey. Where areas exist aim for retention due to high BNG baseline.

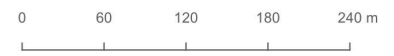
Defunct hedgerows which offer potential for enhancements through gapping up to restore ecological networks.

Woodland and hedgerows offer potential for nesting farmland bird species whilst pasture offers suitable foraging.

Protect and suitably buffer surface water drainage ditch.

Discreet areas of the site have potential to support common species of reptile.

- Key:**
- Site Boundary
 - w1d - Wet Woodland
 - g3c8 - Holcus/Juncus Neutral Grassland
 - Wet Ditch
 - Pond
 - Rural Tree (Broadleaved)



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Figure 1:
Ecological Constraints and Opportunities Plan

Project:
Land at Highley, Shropshire

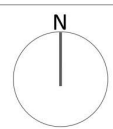
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Date:
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Ecology
Arboriculture
Land Management



APPENDIX 5. ECOLOGICAL CONSTRAINTS AND OPPORTUNITIES PLAN



Ponds (including off site ponds within 250m of the site) have potential to support great crested newt and surveys required to establish presence or absence and inform suitable mitigation strategies.

Hedgerows and associated mature standards retained where possible and sensitively managed to maintain connectivity and linear features. Hedgerow buffers required to accommodate dark corridors for light-averse bat species.

Significant areas of modified grassland pasture present an overall low ecological baseline. Opportunities to create and enhance existing habitats to achieve Biodiversity Net Gain.

Ponds on site that could be restored and enhanced for biodiversity through favourable management. Protected during construction with pollution prevention measures and sensitive drainage strategy to ensure potential for impacts are avoided and mitigated. Opportunities for enhancement and wetland creation in areas adjacent to these habitats as part of SuDS design.

New habitat creation to include a mosaic of linked habitats with associated benefits for biodiversity. New habitat creation to include new woodland and scrub, wildflower and marshy grassland, wetland/SuDS features and new tree and orchard planting. Site is capable of delivering 10% uplift in BNG mandated by the Environment Act 2021.

Aim to retain mature hedgerows and in field trees including those with potential to support roosting bats.

Discreet parcels of wet woodland associated with ponds to be incorporated into site wide strategy for the creation of high-quality linked habitats. Opportunities for enhancement through additional woodland planting to link discreet parcels, successional planting of understorey and suitable long-term management.

Grazed pastures with potential to provide foraging resource for bat populations (including rarer light averse Annex II species). Compensatory habitat creation likely to be required.

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Discreet areas of high quality marshy grassland (holcus/juncus other neutral grassland) requiring further detailed botanical survey. Where areas exist aim for retention due to high BNG baseline.

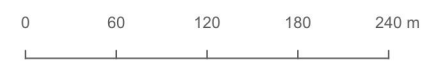
Woodland and hedgerows offer potential for nesting farmland bird species whilst pasture offers suitable foraging.

Protect and suitably buffer surface water drainage ditch.

Discreet areas of the site have potential to support common species of reptile.

Key:

- Site Boundary
- w1d - Wet Woodland
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- Wet Ditch
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Imagery ©2024 CNES / Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies. Map data ©2024 Google

Figure 1:
Ecological Constraints and Opportunities Plan

Project:
Land at Highley, Shropshire

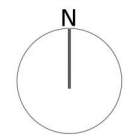
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APPENDIX 6. PRELIMINARY FLOOD & DRAINAGE APPRAISAL

Netherton Lane, Highley, Shropshire

Preliminary Flood and Drainage Appraisal

This preliminary flood and drainage appraisal has been provided for a land area to the west of Highley to provide an understanding of the potential developmental constraints and opportunities and to enable input into a proposed layout.

1 – Background Understanding

Location and Extent

A location plan of the land area is provided as **Figure 1**.

The land area is comprised of 65.25 acres (26.40 hectares) of greenfield land located off Netherton Lane to the west of Highley in Shropshire, WV16 6NA.

The Local Planning Authority (LPA) and Lead Local Flood Authority (LLFA) are Shropshire Council. The public sewerage authority for this area is Severn Trent Water (STW).



Figure 1 – Location Plan

Topography

Data from a LiDAR DTM has been used to enable a review of ground levels, provided as **Figure 2**.

Contours from the LiDAR DTM show a fall in ground levels from the north-eastern part of the land area mainly in a south-westerly direction towards a drainage channel in the western part of the land area.

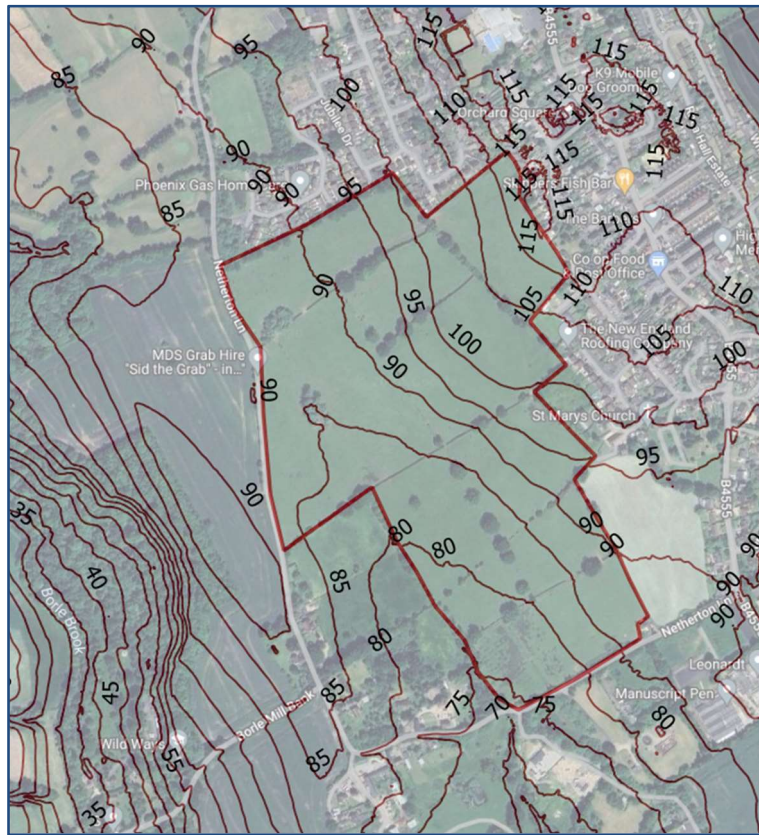


Figure 2 – Ground Levels from LiDAR DTM

Hydrology

The land area is towards the lower part of the hydrological catchment of Borle Brook and in the section of the watercourse between the Source and the confluence with the River Severn, as shown in Figure 3.

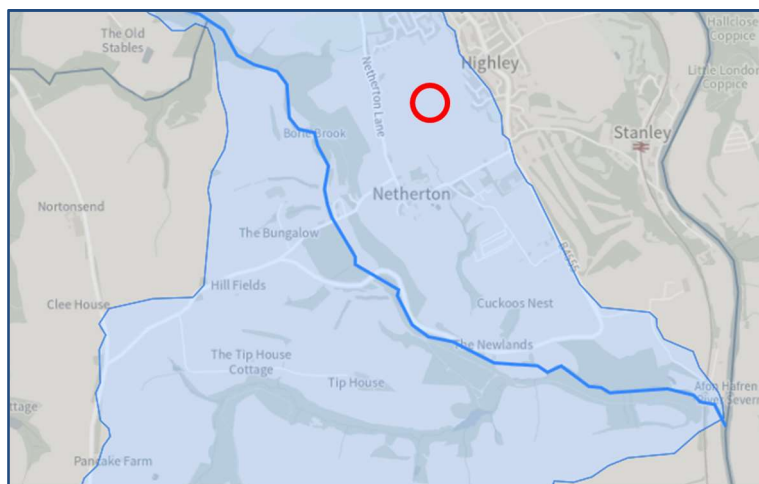


Figure 3 – Hydrological Catchment of Borle Brook

Borle Brook is located to the west and south-west of the land area and drains in a south-easterly and then easterly direction towards the River Severn.

There are drainage channels in the southern part of the land area, that drain south and into Borle Brook. The northern section of this drainage channel is understood to flow within a long culverted section.

These drainage channels will be incorporated into the surface water drainage strategy, with de-culverting to create open channels and also with improvements such as amending the profile to a two-stage channel to improve the water flow and with planting to increase biodiversity and visual interest.

There are also some existing ponds with adjacent areas of wet woodland and marshy grassland in the northern part of the land area. Options to enhance these features would be considered so as to improve the benefits that they provide, notably to water quality, biodiversity, landscape and amenity.

Geology

The 1 to 50,000 scale British Geological Survey (BGS) online mapping provides an understanding of bedrock geology underlying the land area and whether any superficial deposits are recorded, with an extract from this provided as **Figure 4**.

The bedrock geology is the Halesowen Formation underlying the western part of the land area, comprised of mudstone, siltstone and sandstone, and the Alveley Member underlying the central and eastern part of the land area, also comprised of mudstone, siltstone and sandstone. There is a thin strip of the Alveley Member passing under the central part of the land area and also adjacent to the eastern boundary, comprised of sandstone. There are no superficial deposits recorded in this area.

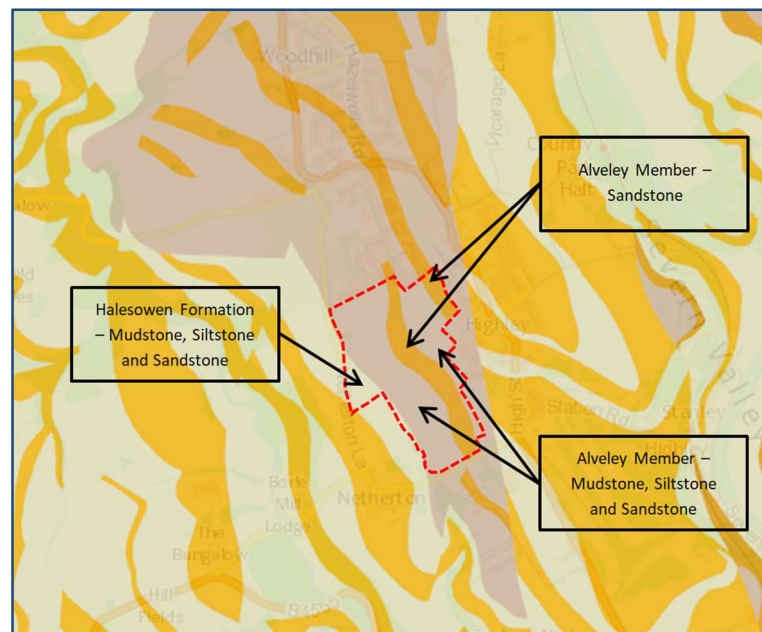


Figure 4 – Bedrock Geology (BGS)

Infiltration testing was completed in 2011 as part of a planning application for a nearby site, located at Jubilee Drive to the north. The site had comparable bedrock geology to parts of the land area, being of the Halesowen Formation and with sandstone underlain by mudstone at depths of around 1.2m.

Soil infiltration testing was completed at four locations at the Jubilee Drive site in accordance with BRE 365. The results of these tests indicated that an infiltration-led drainage strategy would not be suitable for this site, with no soakaway rates recorded. Given the proximity and the similarity of the underlying geology, this may indicate a limited potential for an infiltration-led drainage strategy for the land area.

This would need to be investigated through completion of soil infiltration testing within the land area, to be completed at a later date. For the purposes of this preliminary appraisal and taking a conservative approach, it has been assumed that an attenuation-led drainage strategy would be required.

Hydrogeology

The BGS and EA jointly provide a dataset that classifies the aquifer designations. The designations reflect the importance of aquifers in terms of groundwater as a resource and in supporting surface water flows.

The land area is upon a Secondary A Aquifer for the bedrock geology. These types of aquifer comprise permeable layers that can support local water supplies, and may form an important source of base flow to rivers.

The BGS also provide a Groundwater Vulnerability Map to show the vulnerability of groundwater to a pollutant discharged at ground level. This is based on the hydrological, geological, hydrogeological and soil properties to give a High, Medium or Low classification.

The land area is located where the groundwater vulnerability is described as High. Areas with a High vulnerability can easily transmit pollution to groundwater. They are characterised by high-leaching soils and the absence of low-permeability superficial deposits.

Soils

Local soils will be influenced by the underlying geology, as described above, and by the historical uses of the land. As the land area is mainly comprised of agricultural fields and therefore is greenfield in character, and variations resulting from anthropogenic activities are expected to be limited to the upper soil profile.

An understanding of the local soil types has been provided through a review of the information available from the Land Information System (LandIS), which is an online based product of the National Soil Resources Institute at Cranfield Environment Centre.

The soils across the majority of the land area are described as loamy, which typically would be freely draining.

National and Local Planning Policy

National Planning Policy

The National Planning Policy Framework (NPPF) sets out the national policies for flood risk management in a planning context. The Planning Practice Guidance (PPG) then sets out how to apply the NPPF.

As part of the planning process, the NPPF requires that:

- A site-specific Flood Risk Assessment (FRA) will be undertaken for any site that has a flood risk potential;
- Flood risk potential is minimised by applying a 'sequential approach' to locating 'vulnerable' land uses;
- Sustainable drainage systems (SuDS) are used for surface water disposal where practical;
- Flood risk is managed using flood resilient and resistant techniques, and;
- Residual risks are identified and safely managed.

In terms of the flood risk classification, the NPPF categorises this into Flood Zones:

- Flood Zone 1 – Low probability (< 1 in 1000 years);

- Flood Zone 2 – Medium probability (1 in 1000 to 1 in 100 years); and
- Flood Zone 3 – High probability (> 1 in 100 years).

Sites that are located in Flood Zones 2 and 3 require a site-specific FRA to be provided, to assess the flood risks to and resulting from the proposed development and where required to provide appropriate mitigation and management measures. As shown below, the land area is located in Flood Zone 1.

In addition, sites with a land area that is greater than 1ha would also require an FRA to be provided. This is due to the potential for the development of such a sizeable land area to impact upon the surface water runoff regime and, as a consequence, to change the flooding over the site and surrounding area.

As the land area is greater than 1ha, a FRA would therefore be required should there be a future planning submission for the proposed development of the land area.

The NPPF classifies different types of land use and development in accordance with their vulnerability to flooding. This uses a classification of Highly Vulnerable, More Vulnerable and Low Vulnerable also Essential Infrastructure and Water Compatible Development.

The NPPF then sets out a matrix based on the results of the Flood Zones and the Flood Risk Vulnerability Classification. This indicates whether the proposed land use or development would normally be considered appropriate for location in that particular area.

Residential land uses are classified in the NPPF as More Vulnerable development and commercial land uses are typically classified as Less Vulnerable development. These types of development are considered to be appropriate for locating in Flood Zones 1 and 2.

The main focus of the FRA would therefore be on the measures to manage surface water runoff.

Sequential Test and Exception Test

The NPPF states that development should be located in flood zones with the lowest probability of flooding. This should be achieved by application of the Sequential Test, which aims to steer new development to areas with the lowest probability of flooding.

Where new development is proposed in areas of higher risk, the policy aims to make it safe without increasing flood risk elsewhere and where possible, reducing flood risk overall.

In flood-affected areas, the Exception Test is a method to demonstrate that the flood risk to people and property will be managed satisfactorily. This can allow necessary development to go ahead in situations where suitable sites at a lower level of risk are not available.

The Exception Test requires a proposed development to demonstrate that it will:

- a) Provide wider sustainability benefits to the community that outweigh flood risk, and;
- b) That it will be safe for its lifetime, without increasing flood risk elsewhere and, where possible, to reduce flood risk overall.

Non-Statutory Technical Standards

The NTS for sustainable drainage systems were produced by the Department for Environment, Food and Rural Affairs (DEFRA) in March 2015.

For greenfield developments, the peak runoff rate to a highway drain, sewer or surface water body for the 1 in 1-year rainfall event and the 1 in 100-year rainfall event should not exceed the peak greenfield rate for the same event.

Similarly, where reasonably practicable, the runoff volume to a highway drain, sewer or surface water body in the 1 in 100-year, 6 hour duration rainfall event should not exceed the greenfield runoff volume for the same event.

Surface water conveyance routes under exceedance conditions must ensure that life and property over the site and surrounds are not put at risk in the event of drainage system failure or from storms in excess of design standards.

Local Planning Authority

The Core Strategy Development Plan Document (DPD) is the principal document of the Shropshire Local Development Framework (LDF). This sets out the Council's vision, strategic objectives and the broad spatial strategy to guide future development and growth in Shropshire during the period to 2026.

Policy CS18 on Sustainable Water Management advises that developments will integrate measures for sustainable water management to reduce flood risk, avoid an adverse impact on water quality and quantity within Shropshire, including groundwater resources, and provide opportunities to enhance biodiversity, health and recreation, by ensuring that:

- Planning applications and allocations in the Site Allocations and Management of Development DPD, are in accordance with the tests contained in PPS25 (now replaced by NPPF), and have regard to the SFRAs for Shropshire;
- New development is designed to be safe, taking into account the lifetime of the development, and the need to adapt to climate change. Proposals should have regard to the design guidance provided in the SFRAs for Shropshire;
- All development within local surface water drainage areas, as identified by the Water Cycle Study, and any major development proposals, demonstrate that surface water will be managed in a sustainable and coordinated way. Proposals will be supported by either a Surface Water Management Statement or Plan, depending on the scale of the development;
- All developments, including changes to existing buildings, include appropriate SuDS to manage surface water. All developments should aim to achieve a reduction in the existing runoff rate, but must not result in an increase in runoff;
- New development improves drainage by opening up existing culverts where appropriate;
- Proposals within areas of infrastructure capacity constraint, as identified by the Water Cycle Study and the Implementation Plan, and any major development, demonstrates that there is adequate water infrastructure in place to serve the development;
- New development enhances and protects water quality, including Shropshire's groundwater resources;
- New development, including changes to existing buildings, incorporate water efficiency measures, in accordance with the sustainability checklist in Policy CS6, to meet the water efficiency objectives within the Shropshire Water Cycle Study to protect water resources and reduce pressure on wastewater treatment infrastructure.

A Level 1 Strategic Flood Risk Assessment (SFRA) was produced for Shropshire in 2018 with the purpose of supporting the production of the Local Plan Review. The SFRA aimed to provide an understanding of the risk from all types of flooding across Shropshire, and to present clear and robust evidence.

The key objectives of the SFRA are:

- Inform the Council’s Local Plan review by assessing flood risk from all sources, current and future;
- Produce a comprehensive set of maps presenting flood risk from all sources that can be used as evidence base for use in the Local Plan;
- Take into account climate change;
- Assess the cumulative impact that development will have on flood risk;
- Inform selection of suitable sites for allocation in the Local Plan Review;
- Provide a description of any opportunities to reduce flood risk to existing communities;
- Provide a description of existing measures for the management of flood risk;
- Provide advice for applicants carrying out site specific flood risk assessments making it clear what the requirements are for identified locations to assess and manage flood risk; and
- Provide advice on the use of sustainable drainage techniques for appropriate locations.

3 – Flooding

Fluvial and Tidal Flood Risk

An extract from the EA Flood Map for Planning for the land area is included as **Figure 5**. The dark blue areas on the Flood Map for Planning are Flood Zone 3 (high risk); light blue areas as Flood Zone 2 (medium risk); and areas with no colour are classified as Flood Zone 1 (low risk).

This shows the land area to be wholly located in Flood Zone 1, indicating a low risk of flooding from fluvial and tidal sources. Flood Zone 1 is described in the NPPF as compatible for all development types.

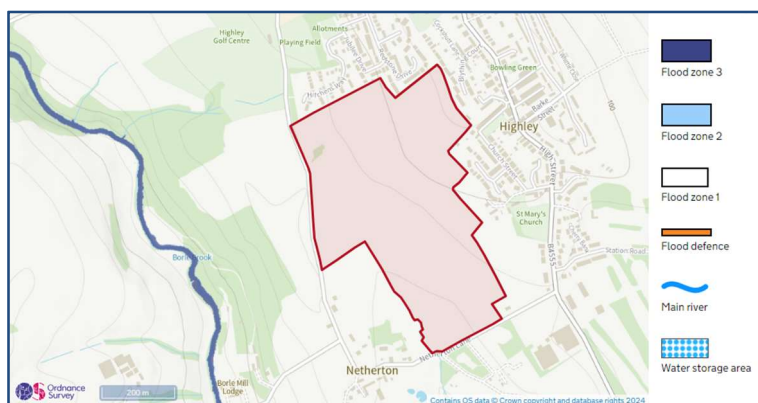


Figure 5 – Flood Map for Planning (Fluvial and Tidal Flooding)

Surface Water Flood Risk

Surface water flooding is a result of overland flow and ponding due to saturated ground that can follow a heavy rainfall event before the runoff can enter a watercourse or sewer. This is indicated on the Long Term Flood Map, with an extract for the land area included as **Figure 6**.

Dark blue areas indicate surface water flooding with a 1 in 30-year chance of occurrence (high risk); blue areas with a 1 in 100-year chance of occurrence (medium risk); and light blue areas with a 1 in 1000-year chance of occurrence (low risk). Areas with no colour indicate surface water flooding with a less than 1 in 1000-year chance of occurrence (very low risk).

This shows the risk from surface water flooding across the majority of the land area to be very low, with a less than 1 in 1000-year chance of occurrence. There is a surface water flow path in the western part of the land area, draining along the south-western boundary towards and then along the drainage channel. This flow path therefore continues south from the land area and drains into Borle Brook.

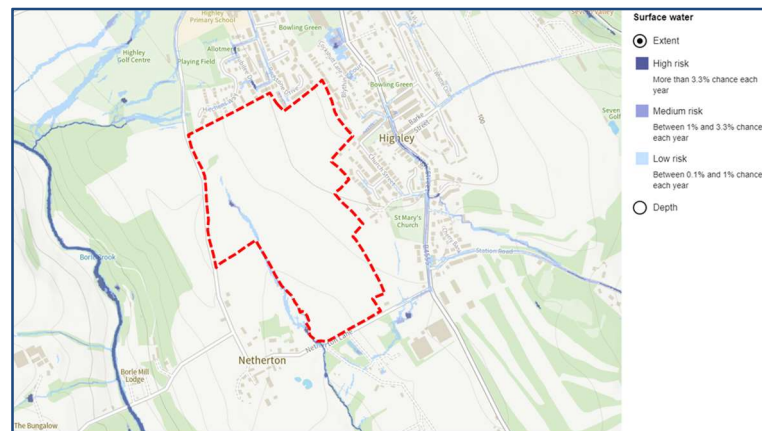


Figure 6 – Long Term Flood Risk Map Extract (Surface Water)

As well as showing flood extents for different return periods, the Long Term Flood Map also provides information of the possible water depth and flow velocity resulting from surface water flooding.

Water depth is classified in three categories – greater than 900mm, between 300mm and 900mm and below 300mm. Flow velocity is classified as either more than 0.25 m/sec or less than 0.25 m/sec. Different classifications of water depth and flow velocity are then provided for flood events with a High, Medium and Low risk of occurrence.

In the surface water flooding event with a low risk, peak water depths are below 0.30m with a few isolated areas within the main part of the flow path where the peak water depth is between 0.30m and 0.90m. In the surface water flooding event with a medium and high risk, the extent of the flow path is substantially reduced and the peak water depths are generally less than 0.30m.

In the surface water flooding event with a low risk, the peak flow velocities could be greater than 0.25 m/sec. In the surface water flooding event with a medium and high risk, the extent of the flow path is substantially reduced and the peak flow velocities could still be greater than 0.25 m/sec.

Groundwater Flood Risk

The mapping of groundwater flood risk has been based on the Areas Susceptible to Groundwater (AStGWF) dataset. The AStGWF is a strategic-scale map showing groundwater flood areas on a 1km square grid. It shows the proportion of each 1km grid square, where geological and hydrogeological conditions indicate that groundwater might emerge. It does not show the likelihood of groundwater flooding occurring and does not take account of the chance of flooding from groundwater rebound.

The AStGWF shows south Shropshire to generally be within the <25% susceptible classification, and therefore at lower risk of groundwater flooding. Parts of north Shropshire fall within higher susceptibility classifications and are therefore at higher risk of groundwater flooding. The land area is located in the southern part of Shropshire, where there is less susceptibility to groundwater flooding.

The SFRA for Shropshire advises that, in general, there should be little concern over groundwater flooding in Shropshire. There are no past incidents of groundwater flooding recorded in the area.

Drainage and Infrastructure Flood Risk

Drainage and infrastructure flooding can occur when sewers become overwhelmed and result in flooding, which may occur alone or be combined with other flood sources (e.g. fluvial or surface water).

The public sewerage authority is STW, and information on the local sewerage asset has been included as **Figure 7**. There is a foul sewer passing from the northern boundary of the land area and in a southerly and then south-easterly direction towards the south-eastern boundary. There are no other sewers crossing the land area. There are surface water sewers in areas to the north and east of the land area.

It is anticipated that there is a highway drainage in the form of gullies and subsurface drains serving the roads in Highley to the north and east of the land area. Highway drainage along Netherton Lane to the east of the land area is likely to be less formal, perhaps through local drainage ditches and channels.

If there are any existing constraints in terms of the capacity or condition of the local sewers or highway drains, then it would be the responsibility of STW as the public sewerage authority and Shropshire Council as the Highway Authority to resolve.

Based on the location and elevation of the land area when compared to the location of these sewers and highway drains, there is not anticipated to be an existing drainage and infrastructure flood risk.



Figure 7 – Extract from Severn Trent Water Sewer Asset Plan

Artificial Sources of Flood Risk

Artificial sources of flooding include impounded waters, such as reservoirs, lakes and canals.

However, there are no known impounded waters in the vicinity of the land area, and as such no risk from artificial sources of flooding. The Long Term Flood Map indicates the areas that could be affected if there were to be a reservoir breach or failure. The land area is not shown to be in an affected area.

Flood Mitigation and Management

Based on the assessment of flood risk, the following flood mitigation and management measures are suggested for the proposed layout.

The finished floor level of new buildings would be elevated above surrounding ground levels to protect against the possibility of shallow ponding from prolonged rainfall. The finished floor level of new buildings should typically be set to at least the greatest of:

- 600mm above the design 1 in 100-year fluvial flood level, with the appropriate allowance for climate change depending on the expected life of the development;
- 300mm above the design water level in any local foul, combined or surface water drainage system; or
- 150mm above local ground levels to minimise flood risk.

A surface water drainage strategy would be incorporated into the proposed layout to manage the surface water runoff from developed areas. Appropriate SuDS features would be used to capture surface water runoff and convey it at a controlled runoff rate to an appropriate discharge receptor.

Built development would avoid being located within the land immediately adjacent to drainage channels. This would help to prevent an adverse flooding impact both to and from built development.

4 – Surface Water Drainage

The NPPF states that flood risk to land and property must not be increased as a result of development, and an allowance for the projected impacts from future climate change would be needed.

The guidance in the NPPF and PPG, the sustainable drainage requirements of the NTS, and the local guidance of Shropshire Council as the LPA and LLFA would be adhered to with the surface water drainage strategy, notably therefore Policy CS18 from the DPD on Sustainable Water Management.

Additional considerations are the environmental and community benefits that a well-incorporated and multifunctional SuDS solution can bring to the proposed layout, such as to water quality, biodiversity, landscape and to amenity and recreational pursuits by contributing to the areas of public open space and to providing a well-connected network of green and blue corridors.

Surface Water Discharge Receptor

The guidance in the NPPF and also from the LLFA promotes the use of the sustainable drainage hierarchy for the discharge of surface water from a developed land area.

The sustainable drainage hierarchy requires that the following preference should be given when identifying the discharge receptor:

- Into the ground (infiltration); then
- To a surface water body; then
- To a surface water sewer; and then
- To a combined sewer.

Surface water discharge options have been investigated in the order of preference as specified in the sustainable drainage hierarchy.

The bedrock geology is comprised of mudstone, siltstone and sandstone of the Halesowen Formation underlying the western part of the land area and the Alveley Member underlying the central and eastern part. There is a thin strip of sandstone of the Alveley Member passing under the central part of the land area and also adjacent to the eastern boundary of the land area.

There are no superficial deposits recorded in this area. The local soils across the land area are described as loamy, which typically would be freely draining.

However, soil infiltration testing completed as part of a recent and nearby development and where there appears to be comparable geology to parts of the land area suggests there to be limited potential for an infiltration-led drainage strategy.

An attenuation-led surface water drainage strategy would therefore be proposed, with a controlled discharge to an appropriate and available discharge receptor. However, drainage features would be proposed that could be used as part of an infiltration-led drainage strategy, should that be found to be viable. There may also be some potential for source control solution in some parts of the land area.

Borle Brook is located to the west and south-west of the land area and drains in a south-easterly and then easterly direction towards the River Severn. There are drainage channels within the southern part of the land area, that drain south and into Borle Brook. The northern section of this drainage channel is understood to flow within a long culverted section

These drainage channels therefore provide the surface water drainage strategy with a viable discharge receptor into a surface water body, with this towards the top of the sustainable drainage hierarchy.

These drainage channels will be incorporated into the surface water drainage strategy, with de-culverting to create open channels and also with improvements such as amending the profile to a two-stage channel to improve the water flow and with planting to increase biodiversity and visual interest.

There are also some existing ponds with adjacent areas of wet woodland and marshy grassland in the northern part of the land area. Options to enhance these features would be considered so as to improve the benefits that they provide, notably to water quality, biodiversity, landscape and to amenity.

Surface Water Drainage Concepts

SuDS features would be included within the surface water drainage strategy and incorporated into the proposed layout to manage the surface water runoff from developed areas to an appropriate runoff rate and volume.

Detention basins and detention ponds have been incorporated into the proposed layout to provide a storage volume for capturing and containing the surface water runoff, also with swales for the conveyance of runoff and source control solutions such as rain gardens and areas of permeable paving.

It is suggested that the proposed layout would also incorporate measures to capture rainwater for use by the residents (e.g. water butts), although with this something to be progressed at a later stage.

Flood and drainage input had been provided to the proposed layout to determine the location and also the extent of these SuDS features to manage the surface water runoff from the developed areas. These SuDS features are included on the framework plan for the land area included as **Appendix A**.

In addition to managing the surface water runoff from the development proposals and the overland flow paths, these SuDS features provide a number of other environmental and community benefits.

This includes improvements to water quality, biodiversity, landscape, and to amenity and recreational pursuits by contributing to the areas of public open space and to providing a well-connected network of green and blue corridors.



Figure 8 – Examples of the Suggested SuDS Features

Preliminary Drainage Input

The land area was separated into drainage catchments with these based on the drainage conveyance direction and the proposed layout and with the area of each drainage catchment then determined.

It was assumed that 60% of each drainage catchment would be impermeable plus an additional 10% to allow for potential future urban creep. This is a conservative approach, since it is likely that source control solutions would also be used to reduce the proportion of impermeable surface, such as areas of permeable paving. The surface water runoff from each drainage catchment was then calculated.

The storage volume required to manage the surface water runoff from the impermeable area in each drainage catchment to greenfield runoff rates was then calculated. In accordance with national and local guidance, this was based on the 1 in 100-year storm event and including a 45% allowance for future climate change.

To inform the proposed layout, it was assumed that the storage would be provided in detention basins and that each basin would have a maximum depth of 1.25m. These detention basins could be included as detention ponds, by deepening the basin beyond a depth of 1.25m. It was assumed that the bank side slopes had a 1 in 3 gradient from the surrounding ground levels and with a 0.30m freeboard provided.

The proposed layout incorporates a series of detention basins adjacent to the drainage channel and also some areas of subsurface geocellular solution for managing the runoff from commercial areas.

Examples of the suggested SuDS features have been provided as **Figure 8**, including detention basins and detention ponds as well as swales that could be included within and adjacent to developed areas.

Foul Drainage

A foul sewer already passes through the land area, from the northern boundary of towards the south-eastern boundary. Appropriate consideration would be given to the location of this foul sewer, either with an easement included through the proposed layout or with re-routing where required.

A foul drainage strategy would be provided for the proposed layout, with STW the public sewerage authority. A foul drainage connection with STW would also therefore be agreed, but at a later stage.

5 – Summary

A preliminary flood and drainage appraisal of a land area to the west of Highley in Shropshire has been completed to provide an understanding of the potential developmental constraints and opportunities.

A background understanding has been provided of the local topography, hydrology, geology, hydrogeology and soils followed by a summary of the relevant national and local planning policy.

The land area is located within Flood Zone 1, indicating a low risk from fluvial and tidal flooding. The NPPF advises that a residential-led development is an appropriate land use to include in Flood Zone 1. The risk from surface water flooding across the majority of the land area is very low. There is a surface water flow path in the western part of the land area, draining to the drainage channel. The flooding from other sources were also considered, with these assessed as being either a low or negligible risk.

There are some suggested flood mitigation and management measures. The finished floor level of buildings would be elevated above surrounding ground levels. Built development would avoid being located in the land immediately adjacent to drainage channels. A surface water drainage strategy would be incorporated into the proposed layout to manage the surface water runoff from developed areas.

Policy CS18 on Sustainable Water Management advises that development proposals should integrate measures for sustainable water management to reduce flood risk, avoid an adverse impact on water quality and quantity, including groundwater resources, and provide opportunities to enhance biodiversity, health and recreation.

The flood and drainage input to the proposed layout has taken into consideration the potential flood risk to and resulting from the land area. An attenuation-led surface water drainage strategy was proposed with an allowance for climate change, and with a controlled discharge to an appropriate discharge receptor. With reference to Policy CS18, new development would therefore be designed to be safe, taking into account the lifetime of the development, and the need to adapt to climate change.

The drainage strategy would incorporate a series of SuDS features to capture and convey surface water runoff. In particular, this would include landscaped features including detention basins, detention ponds and swales. Source control solutions would also be considered, such as rain gardens and areas of permeable paving. Discharge from the land area would be into an existing drainage channel, with this towards the top of the sustainable drainage hierarchy. The proposed layout could also incorporate measures to capture rainwater for use by the residents (e.g. water butts). With reference to Policy CS18, surface water would therefore be managed in a sustainable and coordinated way and would include appropriate SuDS features to manage surface water including a reduction in the existing runoff rate.

The existing drainage channels and ponds within the land area would be incorporated into the surface water drainage strategy, with de-culverting to create open channels and also improvements such as amending the profile to a two-stage channel to improve the water flow and increase biodiversity. With reference to Policy CS18, drainage would therefore be improved by opening up existing culverts.

In addition to managing the surface water runoff from the proposed layout, the SuDS features provide a number of other environmental and community benefits. This includes improvements to water quality, biodiversity, landscape, amenity and also to recreational pursuits by contributing to the areas of public open space and to providing a well-connected network of green and blue corridors. With reference to Policy CS18, water quality as well as a number of other areas would be enhanced and protected.

A foul drainage strategy would be provided for the proposed layout, with STW the public sewerage authority. A foul sewer passes through the land area, from the northern boundary of towards the south-eastern boundary. Appropriate consideration would be given to the location of this foul sewer, either with an easement included through the proposed layout or with re-routing where required. A foul drainage point of connection with STW would also therefore be agreed, but at a later stage.

In summary, this preliminary flood and drainage appraisal concludes that the proposed layout of the land area is appropriate and in keeping with the requirements of Policy CS18 on Sustainable Water Management. A surface water drainage strategy incorporated into the proposed layout would manage the surface water runoff and provide a number of other environmental and community benefits.

Appendix A – Framework Plan



KEY: FRAMEWORK PLAN	
[Red outline]	APPLICATION BOUNDARY
LAND USE:	
[Light tan]	RESIDENTIAL
[Orange]	PRIMARY FRONTAGE ALONG PRIMARY STREET
[Light orange]	IMPORTANT FRONTAGE TO OPEN SPACE (LOW DENSITY)
[Brown]	SELF BUILD AREA (CIRCA 10 PLOTS)
[Purple]	EMPLOYMENT
[Light purple]	LOCAL CENTRE
[Light green]	POS
[Dark green]	ALLOTMENTS
MOVEMENT:	
[Blue arrow]	PROPOSED VEHICLE ACCESS
[Grey line]	PRIMARY STREET
[Red line]	ROAD NARROWING
[Green arrow]	PROPOSED PEDESTRIAN ROUTE
[Blue arrow]	PROPOSED NORTH-SOUTH PEDESTRIAN/CYCLE CONNECTION
[Yellow arrow]	PROPOSED CYCLEWAY
[Green arrow]	PROPOSED PEDESTRIAN CONNECTION
[Red arrow]	DIVERTED PUBLIC RIGHT OF WAY
[Orange arrow]	EXISTING PUBLIC RIGHT OF WAY
[Green arrow]	EXISTING PEDESTRIAN CONNECTION
[Blue circle]	MOBILITY HUB
[Red circle]	CENTRAL MODAL FILTER
ENVIRONMENT:	
[Green tree]	EXISTING TREES AND HEDGEROW (SUBJECT TO TREE SURVEY)
[Green circle]	PROPOSED LANDSCAPE BUFFER
[Green circle]	PROPOSED AREA OF ECOLOGY
[Green circle]	PROPOSED INDICATIVE TREES
[Green line]	TREES/SWALES ALONG VERGE
[Blue circle]	POTENTIAL ATTENUATION BASINS
[Blue line]	EXISTING DITCH
[Blue line]	PROPOSED SWALE/DITCH
[Star]	PLAY (LAP/NATURAL PLAY)
[Star]	PLAY (INEAP)

LAND OF NETHERTON LANE, HIGHLEY - FRAMEWORK PLAN



APPENDIX 7. ACCESS & ACCESSIBILITY TECHNICAL NOTE

Technical Note 1: Access and Movement

Land at Highley, Shropshire

1. INTRODUCTION

1.1 Neil Brant Consulting (NBC) has been appointed by Highley LVA LLP (LVA) to provide advice on matters of highways and transportation in respect of land to the east of Netherton Lane in Highley, Shropshire.

Scope and Purpose

1.2 This access and movement technical note considers matters of access to the LVA land (the Site) east of Netherton Lane responding to the latest emerging Shropshire Local Plan consultation on amongst others the Updated Additional Sustainability Appraisal (SA) of the Draft Shropshire Local Plan Report and Updated Housing and Employment Topic Paper.

1.3 In summary, the technical note demonstrates the Site is in a sustainable location and delivery of a residential led development would not give rise to any access or local transport issues.

Note Content

1.4 This note provides a high level overview of access and accessibility of land east of Netherton Lane (the Site) so as to inform the consultation of the Local Plan Review in respect of the feasibility of access as well as how the site addresses issues of sustainability relevant to accessibility. The remainder of this note is structured as follows:

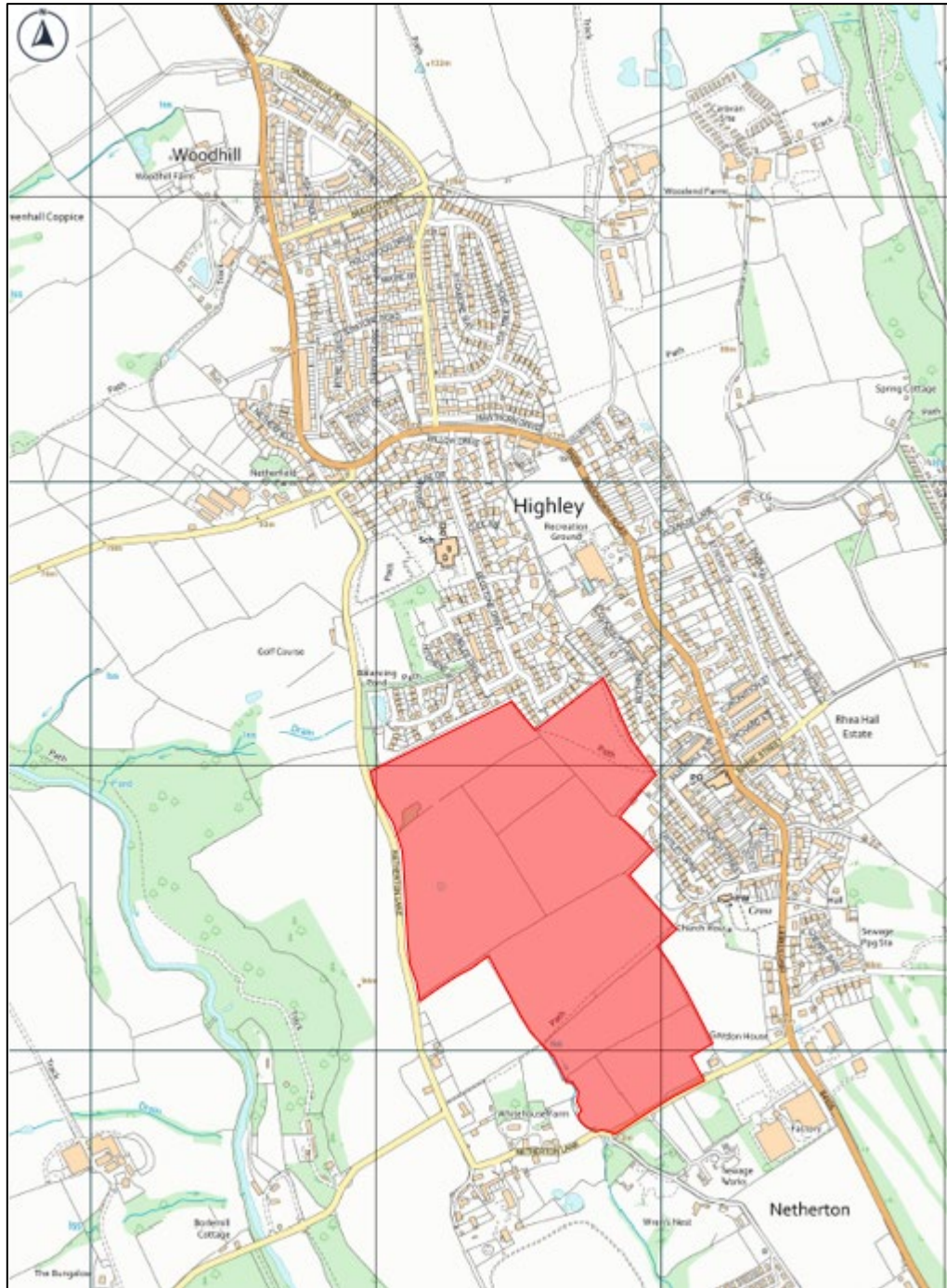
- Section 2 – establishes the existing conditions of the transport network and travel behaviour relevant to the site;
- Section 3 - sets out the principles and approach to achieving sustainable movement (accessibility) and access to development of land east of Netherton Lane;
- Section 4 – sets out initial proposals for a sustainable and innovative access strategy; and
- Section 5 – provides a summary and conclusions from this report.

2. SITE LOCATION

2.1 The Site is located on agricultural land abutting the south west part of the village of Highley extending south and west to Netherton Lane, which forms in part, its western and southern site boundaries, as illustrated in **Figure 1** over the page.

2.2 The site is located in the unitary administrative area of Shropshire Council who act as both Local Planning and Highway Authority. Highley is a large village with a population of c3,700 (2021 census) and has a range of amenities and facilities meeting with local needs and which are further discussed at **paras. 3.7 to 3.9**.

Figure 1: Site Location



3. ACCESSIBILITY

Best Practice Guidance

- 3.1 Walking and cycling are the ultimate forms of zero Green House Gas emission travel. Additionally, walking and cycling are low-cost travel modes available to almost all ages and have an important role to play in achieving social inclusion and equality. Ensuring that there is safe and convenient access to jobs, education,

health care, other services, and local facilities for non-motorised road users is an essential part of promoting social inclusion.

- 3.2 There is a direct relationship between distance travelled and propensity to take-up sustainable travel modes and therefore development located further away or poorly connected to key trip destinations will result in trip lengths being required over greater distances. Therefore, the propensity to take up sustainable travel at Highley will be positively influenced by the site's close proximity and connections to existing facilities, amenities and employment in the village.
- 3.3 Walking is one of the most efficient modes of transport available, with the greatest number of travellers per square unit of highway. Despite this importance there is no definitive guidance on the distance that individuals will be willing or able to walk to everyday facilities and amenities.
- 3.4 However, there is a range of distances that are typically applied, as follows. Guidelines for Providing for Journeys on Foot¹, suggests that the preferred maximum walking distance for commuting journeys is 2km and that approximately 80% of walk journeys in urban areas are less than 1.6km, and from this the 20 minute neighbourhood has been derived. Guidelines for Planning for Public Transport in Developments² indicates that the maximum walking distance to a bus stop should not exceed 400 metres (5 minutes).
- 3.5 In addition to the distance travelled, the quality of infrastructure will encourage or discourage walking and cycling, as set out by the IHT³ it advises on planning for and providing for pedestrians, maintaining the pedestrian infrastructure and promoting walking.

Isochrone Analysis

- 3.6 In line with the established range of reasonable walking distances as set out above, and applying the 20 minute neighbourhood principle from the site area to all amenities and services within Highley, both walk and cycle isochrones⁴ have been assessed and is illustrated in **Figure 2** over the page.
- 3.7 It is evident that nearly all of Highley is accessible within a 20 minute walk time of the site. Within the 20 minute catchment area of the site are a range of local amenities and facilities, and this is illustrated in Figure 3 below for the northern (Area A) and southern (Area B) parts of the site, along with their respective travel desire lines.

¹ Institution of Highways & Transportation, *Guidelines for Providing for Journeys on Foot* (IHT, 2000)

² Institution of Highways & Transportation, *Guideline for Planning for Public Transport in Developments* (IHT, 1999)

³ The Institution of Highways & Transportation, *Guidelines for Planning for Public Transport in Developments* (IHT, 2000) & *Guidelines for Providing for Journeys on Foot* (IHT, 1999)

⁴ National Online Transport Information System: GIS Isochrones

Figure 2: 20 Minute Walk Distance Isochrone



3.8 **Figure 3** over the page illustrates the location of local amenities and facilities and travel desire lines to/from the site. In summary, the local amenities and facilities that have been identified as being within the 20 minute walk time of the Site, include:

- **Education & Child Care;**
 - Highley Primary & Nursery School
 - Highley Minors Child Care – Severn Centre
- **Healthcare;**
 - Highley Medical Centre
 - Highley Pharmacy
- **Sport & Recreation;**
 - Halo Severn Centre
 - Highley Minors Football Club
 - Highley RFC
 - Highley Golf Centre
- **High Street Shops & Community Facilities;**
 - Post Office
 - Co Op Convenience Store
 - Costcutter Supermarket
- **Community Services;**
 - Severn Centre

- Library
- Parish Council Offices
- Police Station
- Churches and assembly, and;
- Social Clubs, Pubs & Restaurants.

Figure 3: 20 Minute Walk Distance Isochrones to Local Amenities & Facilities

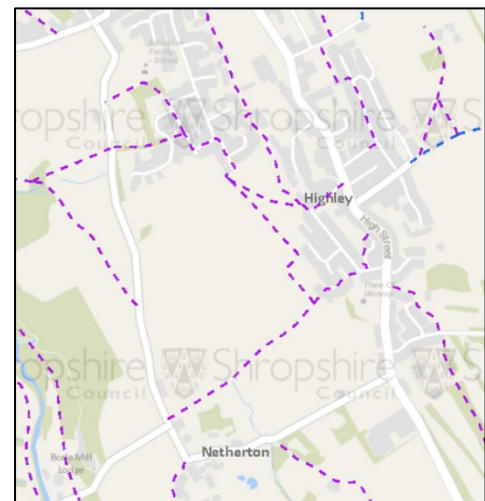


3.9 It is evident that the site is well located with regards to its proximity to local amenities and facilities that can be reached without reliance of use of a private car and therefore meeting with overarching policy objectives on sustainable travel and plan making.

Public Rights of Way

3.10 There are a number of Public Rights of Way (PRoW) across and connecting to the Site as illustrated in mapping extract of the PRoW interactive mapping to the right.

3.11 A number of the PRoW, all footpaths, provide connections through to the village along the northern and eastern site boundaries and therefore have potential to be integrated in to an access strategy for the Site and provide for the connectivity to local facilities and amenities. Other PRoW provide for connections to the countryside and therefore recreational use.



Extract from online Shropshire Council Interactive Mapping

Public Transport

- 3.12 The nearest bus stops to the Site are located on Netherton Road to the south of the Site and along the B4555 / High Street, with all being located well within the desirable 800m (10 minute) walk distance of the Site.
- 3.13 Highley is served by the No. 125 service operating between Bridgenorth and Stourbridge with 12 services weekdays in each direction of travel.
- 3.14 It is evident that the site is well located with regards to its proximity to a bus service that reduces the reliance of use of a private car and therefore meeting with overarching policy objectives on sustainable travel and plan making.

Adopted Public Highway

- 3.15 The Site has direct frontage on to Netherton Lane along parts of its southern and western boundary extending to a continuous length of 415m to the west and 195m to the south. These lengths provide significant opportunity to form vehicular access within land controlled by LVA.

Netherton Lane

- 3.16 Netherton Lane is formed as single carriageway road subject to the National Speed Limit (60mph). The carriageway width varies between 4.1m and 4.7m with the wider sections serving as informal passing places. The absence of vehicle overrun damage to the soft verges is evidence that the informal provision of passing places is currently adequate. The overall highway width, i.e. that including the verges, is significantly greater and is typically around c7m, with a few pinch points of c6.7m and other sections in excess of 8.5m.
- 3.17 Existing traffic volumes on Netherton Lane have been observed to be very light and traffic speeds significantly below the 60mph speed limit, and estimated to be in the 30-40mph range.
- 3.18 Whilst in its current form the carriageway may not be suitable to accommodate any significant increase in traffic resulting from development, it is evident that sufficient highway land exists to accommodate carriageway widening. Therefore, it is evident that there is no insurmountable constraint on the ability bring Netherton Lane up to an appropriate level of provision for the purposes of access to development of the site. A strategy for off-site improvements to Netherton Lane is set out at **paras. 4.7 to 4.9** below.

Road Safety

- 3.19 A review of road safety data shows that there have been no reported accidents resulting in personal injury on Netherton lane in the 5 year period to the end of 2022. Therefore, there are no existing road safety issues that would preclude the suitability of development at Site or the principal of taking access from Netherton Road.

4. SITE ACCESS & MOVEMENT STRATEGY

Active Travel Access

4.1 The Site benefits from being well located in terms of proximity to local amenities and facilities within Highley and as such the focus of connectivity would be in respect of site permeability along its northern and eastern boundaries, reflecting the site travel desire lines illustrated in **Figure 4** below.

Figure 4: Active Travel Desire Lines



4.2 There are good existing points of pedestrian access (**Figure 5** below), PRoW, to the site from Redstone Drive to the north and Silverdale Terrace/Church Street to the east that have potential for upgrading so as to provide connections towards the village amenities and facilities. A new footway could be constructed within the site and highway verge to provide a connection to the existing pedestrian link at Hitchens Way.

Figure 5: Existing Pedestrian Access from Redstone Drive, Silverdale Terrace & Hitchens Way



4.3 Similarly, to the south there is sufficient highway verge to enable the construction of a footway on Netherton Lane (**Figure 6** below) joining with the existing footway provision on the B4555.

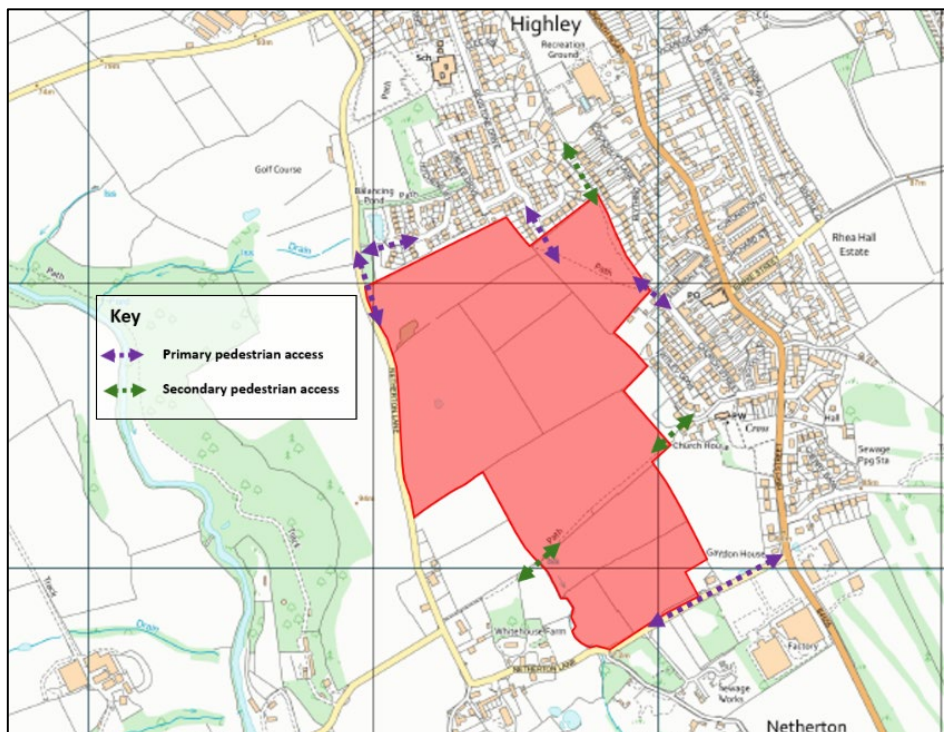
Figure 6: Netherton Lane up to B4555



4.4 In all four instances, it is envisaged that the footways could be lit to provide for safe pedestrian access at all times and therefore providing the necessary level of site permeability in all directions of travel to/from the village. The two other PRoW accesses, to the rear of Cockshutt Lane and Church Street, have potential for less formal use, and primarily recreational use, as it may not be possible to undertake upgrading works.

4.5 In summary, primary pedestrian access would be taken to Netherton Lane to the south and northwest and Redstone Drive and Silverdale Terrace to the north and east respectively. Collectively, they would accommodate the travel desire lines from the site to local amenities and facilities, including bus routes as shown in **Figure 7** below.

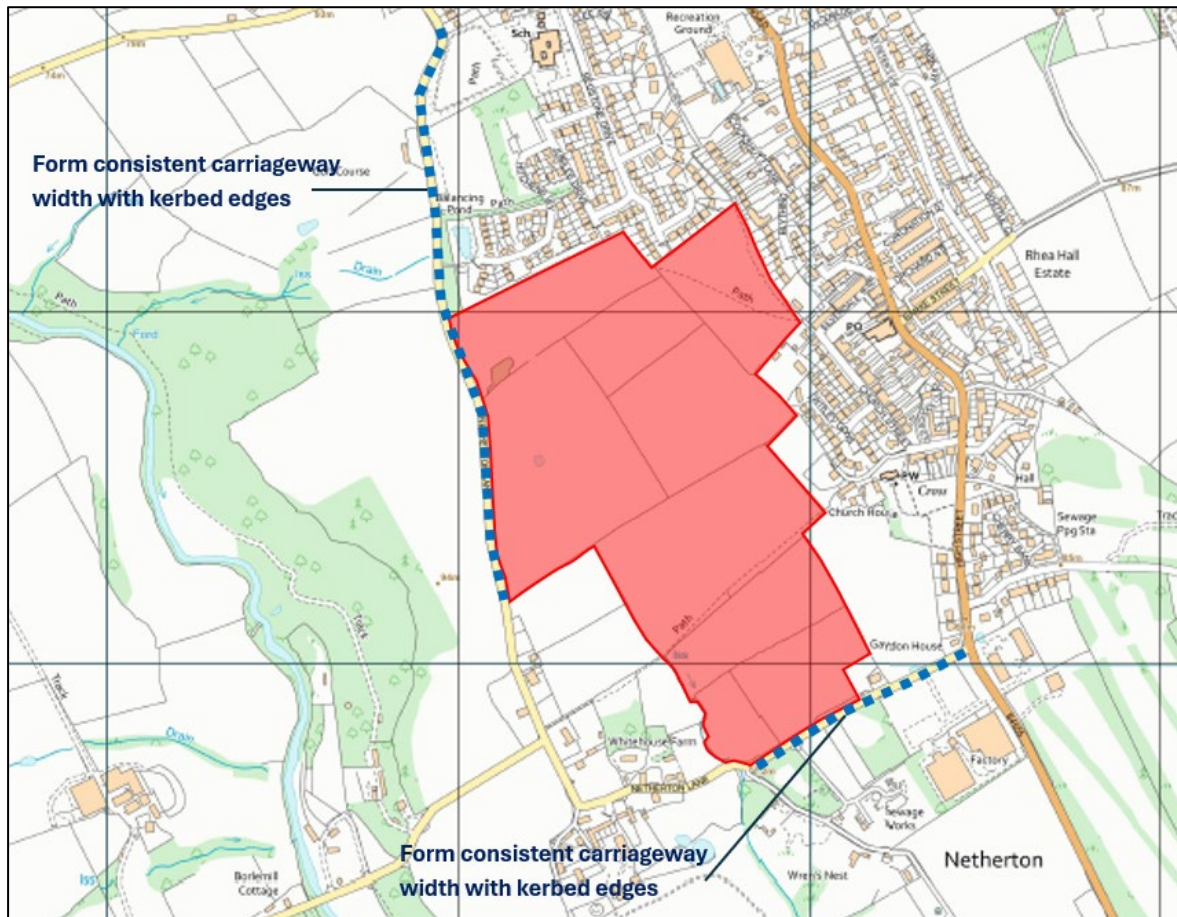
Figure 7: Pedestrian Access Connections



Vehicular Access

- 4.6 The issue of constraint on development as a consequence of the standard of highway provision of Netherton Lane has been considered and summarised in **paras. 3.15 to 3.19** above and found that off-site improvements are feasible and would not unduly preclude development from occurring. It is considered that access could be taken to the site from two general locations, the northwest and south, both on to Netherton Lane.
- 4.7 Off-site highway improvements would consist of formalising the road width and carriageway edges of sections of Netherton Lane so as to provide a consistent and coherent level of provision. That would typically consist of carriageway widening to provide a minimum width of 5.0m, whereby a width of 4.8m allows for a car and HGV to pass, for sections of road from the site access to the B4555. In the event that sufficient highway land was not available at any localised point, a formal shuttle working layout would be introduced.

Figure 8: Off-Site Highway Improvements



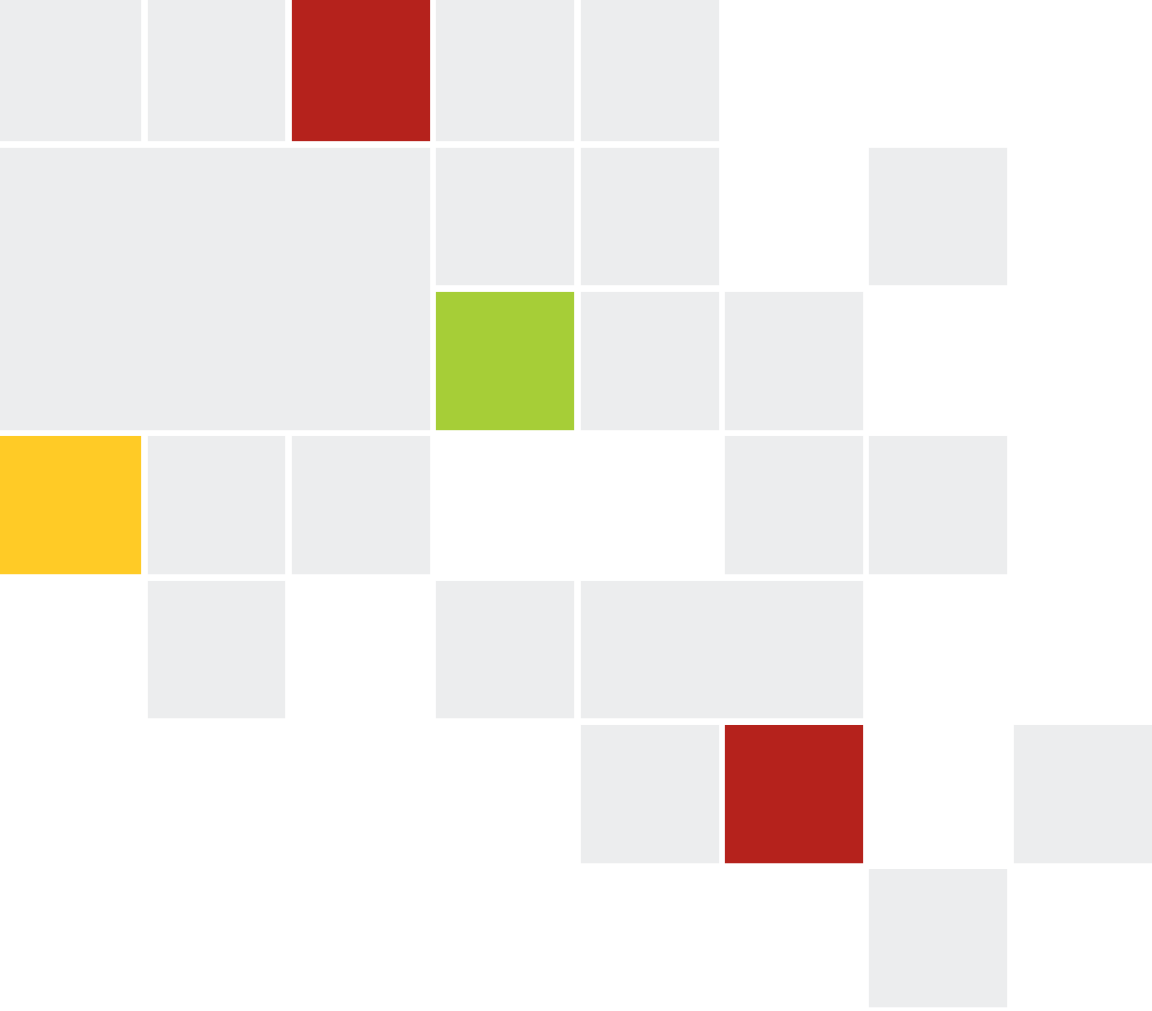
- 4.8 In conjunction with the carriageway works, it would be appropriate to reduce the speed limit on Netherton Lane to 30mph and thereby closer to current vehicle speeds.

Internal Road Layout

- 4.9 The Site would incorporate a network of estate roads, avenues, streets, cul-de-sacs and shared spaces meeting the needs of users not only in terms of travel but also as places to live. The majority of streets should be 20mph zones and could be designed to even more stringent 15mph design speeds whereby priority would not be given to vehicles but shared with pedestrians and cyclists. Where possible, traffic and parking will be removed from streets and the spaces fronting homes will be vibrant spaces.
- 4.10 Pedestrian and cycle crossings of all roads would be formalised in most instances and priority given to those users.
- 4.11 The submitted illustrative masterplan shows how the internal layout of site roads could see the distribution of traffic on to Netherton Lane to two points of access. Whilst it shows a central modal filter (pedestrian and cycle link), there is no reason to preclude a continuous road route for all users and thereby negating the need for traffic to use Netherton Lane through Netherton itself.

5. SUMMARY & CONCLUSIONS

- 5.1 The Site is located within easy walking distances of all local amenities and facilities within Highley and has therefore been found to be well located to encourage walking and cycling. Bus services pass close to the Site, within easy walking distance, and provide opportunity for travel beyond the village not to be reliant upon car use. Footway provision across the village is good and connectivity of the site to the village has been found to be feasible.
- 5.2 It has been found that the permeability of the site can be achieved through footway connections in the direction of the village and facilitating walking trips to local amenities, facilities and the bus service.
- 5.3 No road safety issues have been identified that would preclude development of the site or access of it on to Netherton Lane. It has been found that off-site improvements to upgrade sections of Netherton Lane to a consistent carriageway width are feasible and of a scale that could be met by development. With the off-site highway improvements in place the standard of highway provision would be appropriate to accommodate traffic from the development without adverse traffic impacts.
- 5.4 It is considered unlikely that any significant traffic capacity impacts would occur at the junctions of Netherton Lane with the B4555, or any other local road or junction.
- 5.5 In conclusion, active travel, public transport and vehicular access connections of the Site have been established as feasible and deliverable and significant off-site road safety and capacity traffic impacts are unlikely.



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